

1 A. DASRATH

2 A. Yes.

3 Q. So, at that time --

4 A. April 22nd or 23rd?

5 Q. Your e-mail to Dr. Fernandez

6 below is April 22nd, 2006 on Saturday?

7 A. Oh, yes.

8 Q. So, at that point you were
9 aware of a failing grade; is that correct?

10 A. I don't know if it is a failing
11 grade. They just list phony grades.

12 Q. Dr. Fernandez, I see a failing
13 grade as a final grade?

14 A. I'm just questioning this
15 whether it is a failing grade. I don't know
16 what the guy is listing. I don't know what
17 he is doing.

18 Q. So, you see a failing grade on
19 this web site you logged into?

20 A. Yes.

21 Q. And you e-mailed Dr. Fernandez
22 to check certain items?

23 A. Yes.

24 Q. It says please check, I don't
25 see an upgraded grade for my EPI/Biostatic

1 A. DASRATH

2 grade.

3 What is EPI/Biostatics?

4 A. I think I'm referring to
5 epi-dermanolog.

6 Q. That is a portion of the AICM
7 class?

8 A. There was a lecture. I don't
9 know if there were grades. If grades were
10 allocated for it. But, I suspect grades were
11 allocated for it.

12 Q. It says only the first failing
13 grade of 50 out of 76 are there.

14 What were the 50 out of 76 that
15 you were referring to?

16 A. I don't know what it is. A lot
17 of these things are phony. This web site
18 doesn't exist, to my knowledge. I tried to
19 sign on. So, lots of phony things will show
20 up and I'm questioning a lot of these
21 things.

22 Q. You didn't know of any failing
23 grade of 50 out of 76 prior to this log on to
24 the web site?

25 A. I don't know what it is.

1 A. DASRATH

2 Q. You say what happened to the
3 remediated grade? Did you remember taking
4 an exam?

5 A. Yes.

6 Q. What exam was that?

7 A. They make you take exams any
8 time you want. I don't recall which specific
9 exams. They make you take exams and I don't
10 know where they came from.

11 Q. Did you remediate a failing
12 grade in the AICM course?

13 A. Yes.

14 Q. So, you retook an exam?

15 A. Yes.

16 Q. And did you pass that exam?

17 A. I don't know.

18 Q. It says 36 percent for the
19 final essay is very unconscionable.

20 A. Yeah.

21 Q. So, for the AIMC course you
22 talk about five exams that were certification
23 exams?

24 A. Yes.

25 Q. Was there a final essay exam

1 A. DASRATH

2 separate from the five certificationcs?

3 A. It may belong to one of those
4 tests.

5 Q. Was it called the final
6 essay?

7 A. I don't recall anything called
8 a final essay. But sometimes it comes up
9 like this. They will tell you you failed a
10 final essay and you don't know what they are
11 talking about so you got to question it.

12 Q. And the person that marked it
13 did not do a fair job.

14 What was the basis for that
15 statement?

16 A. I didn't remember failing
17 anything.

18 Q. So, the final essay, was this
19 the first time that you had revised your
20 grade for that final essay portion of the
21 course?

22 Was this the first time that
23 you saw 36 percent for the final essay?

24 A. Yeah.

25 Q. Do you know who marked it?

1 A. DASRATH

2 A. I don't know.

3 Q. You were concerned, it appears
4 I knew what was asked and what the answers
5 were, my poor penmanship may have annoyed the
6 marker, but not a reasonable excuse to get a
7 failing grade.

8 Do you recall what led you to
9 believe that your poor penmanship might have
10 been the reason why you failed the essay?

11 A. I do have poor penmanship and
12 some people get annoyed. That has been a
13 long-standing problem.

14 Q. Did you discuss your final
15 essay grade with Dr. Fernandez in your
16 conversation with him on the phone?

17 A. No.

18 Q. Did you discuss your penmanship
19 with him on the phone?

20 A. No.

21 Q. It says also look at my second
22 case write-up.

23 What is a case write-up?

24 A. Sometimes they just ask --
25 they give you information about the paper and

1 A. DASRATH

2 ask you to write something and give it to
3 them.

4 Q. How many case write-ups did you
5 complete?

6 A. So far as I remember this is
7 the only time I did one.

8 Q. It says look at my second case
9 write-up.

10 Would you have a first case
11 write-up?

12 A. I don't recall.

13 Q. Under subjective conditions it
14 says such as this, any reader can give any
15 essay a C minus and cause the student a
16 failing final grade.

17 What was the basis for that
18 statement?

19 A. I don't know where the credit
20 minus came from.

21 Q. What were you referring to?

22 A. I'm referring to things I did
23 in Miami. Sometimes we write up things and
24 give it to them. I don't know which one was
25 what.

1 A. DASRATH

2 Q. Did you receive a C minus?

3 A. Maybe I did. I don't recall
4 it.

5 Q. Were you taking issue with the
6 C minus?

7 A. I really didn't take issue with
8 them.

9 Q. Did you agree with that
10 grade?

11 A. Not at all.

12 Q. And then the last, number four
13 I should say, how did I end up with a 36/50
14 in the extra credit after ten points were
15 allocated for staying to the end of the soap
16 notes lecture which I did.

17 What is the soap notes
18 lecture?

19 A. I don't know if it is called
20 soap. Yeah, soap. He said he was giving
21 points if you just sit in the class to the
22 end. He was giving ten points. But I
23 thought it was false information he was
24 giving.

25 Q. So, did you get the ten

1 A. DASRATH

2 points?

3 A. I didn't think it exists.

4 Q. What is the false information
5 he was given?

6 A. That he just stands in front of
7 the class and was given all those people that
8 stay there ten points.

9 Q. Did you write up notes from
10 that lecture?

11 A. I'm sure I took notes, yes.

12 Q. It says I wrote up my soap,
13 presented it and answered all the questions
14 correctly except for one.

15 He has people walking around
16 asking you questions. They are happy to give
17 you points.

18 When you were writing this
19 e-mail to Dr. Fernandez, were you concerned
20 that you didn't get points for that lecture?

21 A. I don't know what I had points
22 for, what I didn't have points for.

23 It's very confusing at that
24 point and I have to wait for my grade from
25 the registrar's office.

1 A. DASRATH

2 Q. Why did you have to wait for
3 your grade from the registrar's office?

4 A. Because of the erratic way of
5 giving grades. They have a strange way of
6 giving grades.

7 Q. You had to wait for your grade
8 from the registrar's office because of the
9 erratic way they give grades?

10 A. Yeah.

11 Q. I don't understand that. Can
12 you explain that?

13 A. It's very difficult to know
14 what your grade will be until you get it from
15 the registrar's office.

16 Q. But when you logged into the
17 Devry web site and you saw a failing grade,
18 you didn't believe it was a failing grade
19 because you hadn't received the transcript?

20 A. I didn't receive a transcript
21 until August the 14th, 2006.

22 Q. Did that transcript also
23 reflect a failing grade?

24 A. Yes.

25 Q. So, then did you believe that

1 A. DASRATH

2 you failed the course?

3 A. No.

4 Q. So, in April of 2006 you didn't
5 fail the course?

6 A. No.

7 Q. And in August of 2006, you
8 didn't believe that you failed the course?

9 A. No.

10 Q. You said you had a conversation
11 with Dr. Fernandez by phone.

12 We talked about that earlier?

13 A. Yes.

14 MS. McLAUGHLIN: I have another
15 exhibit.

16 (Whereupon, the aforementioned
17 memo was marked as Defendant's Exhibit
18 G for identification, as of this date,
19 by the Reporter.)

20 Q. I'm going to ask you to take a
21 look at that memo.

22 A. Yes, I took a look at this
23 memo.

24 Q. Showing the witness what has
25 been marked as Exhibit G and it is entitled

1 A. DASRATH

2 memorandum for the record, April 24th, 2006.

3 I will ask you have you seen
4 this prior to you sitting here today?

5 A. Yes.

6 Q. When was the first time that
7 you saw this?

8 A. When the case was in the
9 Supreme Court. I believe it was 2006.

10 Q. First line says Dr. Fernandez
11 conferred today by telephone with Anand
12 Dasrath about the failing grade he earned for
13 the fifth semester just concluded.

14 Does that make sense that April
15 24th, 2006 would have been the time you
16 called or spoke with at least Dr. Fernandez
17 on the phone?

18 A. Yes, it seems to be.

19 Q. Dr. Fernandez informed Anand
20 that he was essentially two Standards
21 Deviations from the norm.

22 Did he communicate that to you
23 during that phone conversation?

24 A. No.

25 Q. He said that Anand earned a C

101

1 A. DASRATH

2 on the mid-term exam, failed the final exam,
3 and had a very low score on the essay
4 portion, a 63 out of a possible 200.

5 Did you discuss those items
6 with Dr. Fernandez on that telephone call?

7 A. I don't recall this.

8 Q. You received a C on the
9 mid-term exam?

10 A. I don't recall receiving a C on
11 the mid-term exam.

12 Q. Did you know what your score
13 was on the final exam?

14 A. The final exam was for each
15 part. They were passing. Each final exam I
16 took for each part passed.

17 Q. So, did you not believe that
18 you failed the final exam?

19 A. No.

20 Q. And the essay portion, do you
21 remember writing for the essay portion for
22 the exam?

23 A. I may have written, but I don't
24 know if I recall for the written for the
25 final exam.

1 A. DASRATH

2 Q. Do you recall writing for an
3 exam where you were concerned about your
4 penmanship?

5 A. Sometimes we do write, yes, I
6 have bad penmanship.

7 Q. You just don't recall having a
8 written portion of an exam for this AICM
9 course?

10 A. I don't recall.

11 Q. At any time did you learn that
12 you received a 63 out of a possible 200 on
13 the essay portion of the exam?

14 A. I don't know what it is.

15 Q. Was that posted on the internet
16 site that you logged into, to learn of your
17 grade?

18 A. Not to my knowledge.

19 Q. Did you learn that during the
20 conversation with Dr. Fernandez?

21 A. He never mentioned it to me. I
22 don't recall him saying that.

23 Q. So, the first time that you
24 learned of this is when you saw this memo in
25 the Supreme Court matter?

1 A. DASRATH

2 A. Yes.

3 Q. It looks like according to this
4 memo there were two write-ups.

5 Is that the soap write-up that
6 we were referring to earlier?

7 A. I don't know what they are
8 referring to.

9 Q. You don't remember any
10 write-ups from the AMCI course?

11 A. There were things that they
12 wrote. I don't recall write-ups.

13 Q. Do you remember any scores on
14 the write-ups or points for them?

15 A. I don't recall. Now and then
16 there are scores, but I don't recall exactly
17 what he is referring to.

18 Q. Were you given any of these
19 scores during the course of the semester?

20 A. No.

21 Q. So, you never received a score
22 during the course of the semester, only until
23 you received your final grade was the only
24 time that you learned of your progress in
25 that class?

1 A. DASRATH

2 A. After I received my final --
3 after he placed that F on his web site I
4 became suspicious something is going on and I
5 see all of this came out.

6 Q. I guess during the year though
7 do you get grades on tests or scores on your
8 write-ups as the course goes along? Or are
9 you just hand in exams and you don't know
10 what the scores are until the end?

11 A. I get the certificates.

12 Q. Just the five certifications?

13 A. Yes.

14 Q. But no other write-ups do you
15 receive points for?

16 A. It wouldn't stand out in my
17 memory as being the basis for passing or
18 failing the exam.

19 Q. But you don't know what your
20 scores were?

21 A. I don't know what they were.

22 Q. You know you passed the five
23 certifications?

24 A. Yes.

25 Q. Were they scores or were they

1 A. DASRATH

2 just pass/fail?

3 A. I believe they were scored.

4 Q. Do you know what the scores
5 were on those five certifications?

6 A. I have to look into it. I
7 think they were high, in the 90s. I remember
8 one was 100. I would have to look up and
9 match the scores.

10 MS. McLAUGHLIN: I put a
11 request on the record for any records
12 of the scores on the five
13 certifications you received or any
14 other scores you received in the AICM
15 class, if you have them.

16 A. They should have them. I have
17 the certification. They have that.

18 Q. But to the extent that you have
19 any records of these scores.

20 MR. COSTELLO: We will provide
21 them if we have them.

22 Q. Do you recall what the physical
23 exam was?

24 A. Yes.

25 Q. When did you take that?

1 A. DASRATH

2 A. At the end of the AICM course.

3 Q. Did you take it more than
4 once?

5 A. Yes.

6 Q. When did you first take it?
7 Was it in April of 2006?

8 A. Yes.

9 Q. What was your score the first
10 time you took it?

11 A. I don't know the score.

12 Q. So, you failed it the first
13 time then?

14 A. I don't believe I failed it,
15 but he just instruct some people to retake
16 it. To my knowledge I passed it the first
17 time.

18 Q. To the school's knowledge, was
19 it reflected as a failing test?

20 A. No.

21 Q. So, you passed the first time
22 and you were told to retake it?

23 A. Yes.

24 Q. The school told you you passed
25 the test the first time?

1 A. DASRATH

2 A. Somebody in that office says to
3 retake it and I redid it.

4 Q. And you didn't know why you
5 were retaking it?

6 A. They just list some people to
7 retake it. It doesn't have to be a pass or a
8 fail.

9 Q. And when you retook it, did you
10 pass or fail?

11 A. Again, the score, to my
12 knowledge, I scored very high both times.

13 Q. What did you score the first
14 time?

15 A. I think a 97 percent.

16 Q. What did you score the second
17 time?

18 A. 94 percent.

19 Q. How much of the final grade in
20 your AICM course was comprised of the
21 physical exam?

22 A. This is just to pass it or fail
23 it. If they say you pass it, you pass it.

24 Q. So, it doesn't matter if you
25 get a 97 or 77 percent?

1 A. DASRATH

2 A. To my knowledge I don't know
3 how it is graded.

4 Q. During the conversation that
5 you had on April 24th with Dr. Fernandez, did
6 he tell you that you would have to repeat the
7 AICM course?

8 A. I don't recall if he said I
9 have to repeat or not.

10 Q. If you have a failing grade in
11 the course, are you required to repeat the
12 class as you did earlier in the genetics
13 class?

14 A. Yes.

15 Q. And are you required to repeat
16 the course in the semester immediately
17 following the failing class as you did in
18 genetics?

19 A. No.

20 Q. You are not required to retake
21 the class?

22 A. The AICM course can be taken
23 later.

24 Q. What is the basis of that
25 statement?

1 A. DASRATH

2 A. We were having summer vacation
3 following the AICM course.

4 Q. Who was having summer vacation,
5 I'm sorry?

6 A. I was having summer vacation.

7 Q. You were personally having a
8 summer vacation that summer?

9 A. And the rest of the class.

10 Q. And the rest of the class?

11 A. Yes.

12 Q. So, if you failed the AICM
13 class, you don't have to take the semester
14 immediately after, if you are having a
15 vacation?

16 A. No.

17 Q. When do you to have retake the
18 class?

19 A. If someone fails the AICM, they
20 can do it after the summer vacation.

21 Q. How do you know that?

22 A. That was stated by Dr.
23 Fernandez.

24 Q. So, did Dr. Fernandez tell you
25 that you would have to take the class

1 A. DASRATH

2 starting May 22nd or some other time?

3 A. No.

4 Q. He didn't tell you that you
5 would have to retake the class starting May
6 22nd?

7 A. No.

8 Q. Did he tell you that you would
9 have to do three weeks of clinicals?

10 A. No.

11 Q. Did he tell you that you would
12 have to do one write-up until a grade
13 satisfactory or better is achieved?

14 A. No.

15 Q. Did he tell you you were exempt
16 from the EPI and the PE, the PE being, I
17 believe the physical exam?

18 A. We didn't have this
19 discussion.

20 Q. So, he didn't tell you that?

21 A. To my knowledge, no.

22 Q. Did he tell you that you must
23 attend large and small group sessions except
24 for the EPI?

25 A. No.

111

1 A. DASRATH

2 Q. Did he tell you that you must
3 take the mid-term and finals?

4 A. No.

5 Q. At any point did you apply to
6 retake the AICM class?

7 A. No.

8 Q. Why not?

9 A. I was never asked. I was never
10 pre-registered for it.

11 Q. You were never pre-registered
12 for it?

13 A. Yes.

14 Q. What does pre-register mean?

15 A. Pre-register means whatever
16 class Ross wants you to take they
17 pre-register and send you a bill. You are
18 pre-register in the class.

19 When you pay you become
20 registered. I didn't do any registration. I
21 never did any registration.

22 Q. Did Dr. Fernandez ever tell you
23 either during this conversation or others
24 that you could defer starting to take the
25 AICM course in September?

1 A. DASRATH

2 A. No.

3 Q. Do you ever remember telling
4 Dr. Fernandez that if you knew that you spent
5 two years in hospitals as a pharmacist?

6 A. No.

7 Q. Did you have any discussions
8 with Dr. Fernandez during this conversation
9 about tuition?

10 A. No.

11 Q. What happened during this phone
12 call to Dr. Fernandez on April 24th, 2006?

13 A. I'm still waiting for an answer
14 from Dr. Fernandez.

15 Q. And Dr. Perri that you referred
16 to got back to you by e-mail; is that
17 correct?

18 A. Yes.

19 Q. I'm going to show you an
20 exhibit.

21 MS. McLAUGHLIN: Let's mark
22 this as the next exhibit.

23 (Whereupon, the aforementioned
24 e-mail was marked as Defendant's
25 Exhibit H for identification, as of

1 A. DASRATH

2 this date, by the Reporter.)

3 Q. You had a chance to look at
4 what is called Defendant's Exhibit H.

5 A. Yes.

6 Q. It appears to be an e-mail from
7 Dr. Perri to Mr. Dasrath dated Friday, May
8 12th, 2006.

9 The first line in the e-mail
10 says I'm in Dominica still waiting to speak
11 to Dr. Fernandez. I will follow-up when I
12 get the details from him.

13 Do you recall receiving this
14 e-mail from Dr. Perri?

15 A. Yes.

16 Q. In between your conversation
17 with Dr. Fernandez and this e-mail, did you
18 have any other conversations with anyone at
19 Ross concerning your AICM course?

20 A. I don't recall.

21 Q. And Dr. Perri did she get back
22 to you after this e-mail?

23 A. No.

24 Q. The e-mail below this, on the
25 same page, from Friday, May 5th -- I'm

114

1 A. DASRATH

2 sorry, May 12th, 2006 from you to Dr. Ferri,
3 refers to a phone call you had with her on
4 May 8th.

5 Do you recall what you
6 discussed on that phone call?

7 A. Yes, I have a recollection of
8 that, yes.

9 Q. What did you say to her?

10 A. I told her that Dr. Fernandez
11 is posting failing grades, which seems to me
12 a phony failing grade and Devryu.net. The
13 web site.

14 Q. So, you told her it was a phony
15 failing grade in that conversation?

16 A. That was my belief.

17 Q. Why was the phony?

18 A. Because it didn't reflect my
19 performance in the course.

20 Q. And why did you believe your
21 performance warranted a passing grade?

22 A. All the proof that I had were
23 passing.

24 Q. The five certifications?

25 A. Yes.

1 A. DASRATH

2 Q. And the last line of the first
3 paragraph, it says I previously requested
4 that write-up and the soap notes weeks ago
5 from them.

6 Did you request that
7 information from Dr. Fernandez in your
8 conversation with him?

9 A. If he did mention, I would want
10 to see what he was talking about and I did
11 request what he was talking about, but he
12 didn't give me anything.

13 Q. So, you recall discussing with
14 him the soap notes?

15 A. He mentioned it and I wanted to
16 see what it was.

17 Q. Did you ever receive those
18 notes, by the way?

19 A. I didn't receive anything from
20 him. I never received any soap notes from
21 him.

22 MS. McLAUGHLIN: I'm going to
23 mark the next exhibit.

24 (Whereupon, the aforementioned
25 letter was marked as Defendant's

1 A. DASRATH

2 Exhibit I for identification, as of
3 this date, by the Reporter.)

4 Q. So, you e-mailed Dr. Perri on
5 May 8th and you said you didn't hear from her
6 after that?

7 A. Yes.

8 Q. Did you speak with anyone else
9 after the May 8th conversation with her and
10 before the date of this exhibit, which is May
11 15th?

12 A. I don't recall any such
13 conversations.

14 Q. Showing you what has been
15 marked as Defendants' Exhibit I and is dated
16 May 15th, 2006.

17 I would like you to take a look
18 at that.

19 A. I took a look.

20 Q. Is this your signature on this
21 letter?

22 A. Yes.

23 Q. It appears to be a letter from
24 you to the office of the registrar at Ross
25 University?

1 A. DASRATH

2 A. Yes.

3 Q. In this letter you request a
4 student transcript?

5 A. Yes.

6 Q. And a student handbook?

7 A. Yes.

8 Q. Why was that?

9 A. I wanted the student transcript
10 to see if I had a grade in my AICM course.

11 Q. Had you received your official
12 transcript yet?

13 A. No.

14 Q. So, the official transcript had
15 not yet been released; is that correct?

16 A. No.

17 Q. Why did you ask for the
18 handbook?

19 A. I wanted to see what -- how I
20 can proceed because there is a problem
21 here. I want to see what is in the
22 handbook.

23 Q. Did you receive a copy of the
24 handbook and your grade?

25 A. I received a copy of the grade,

1 A. DASRATH

2 but not a copy of the handbook.

3 MS. McLAUGHLIN: I'm going to
4 mark this document as Exhibit J.

5 (Whereupon, the aforementioned
6 transcript was marked as Defendant's
7 Exhibit J for identification, as of
8 this date, by the Reporter.)

9 Q. Did you have a chance to take a
10 look at it?

11 A. Yes.

12 Q. Defendant Exhibit J. It appears
13 to be a transcript and is dated 5/22/2006
14 several days after the letter that you wrote
15 to Ross.

16 Is this the transcript that you
17 received in response to your letter?

18 A. Yes.

19 Q. On this transcript, are your
20 scores reflected yet for the AICM course?

21 A. No.

22 Q. So, there is no entry yet for
23 the AICM course as of May 22nd, 2006?

24 A. No.

25 Q. Was it your understanding that

1 A. DASRATH

2 there should have been an entry for this
3 course as of May 22nd, 2006?

4 A. Yes.

5 Q. Why is that?

6 A. It was several weeks already
7 since I was waiting for this entry.

8 Q. Why were you waiting several
9 weeks for this entry?

10 A. I wanted to see my grade for
11 the AICM course.

12 Q. Are there any requirements that
13 the AICM course or any grade be posted
14 several weeks after the final grade is
15 issued?

16 A. It is usually posted within two
17 weeks.

18 Q. What do you mean by posted?

19 A. It is in the registrar's
20 office, and in the transcript.

21 Q. And that's based on your past
22 experience?

23 A. Yes.

24 Q. Is there anything that requires
25 Ross University to submit the grade to the

120

1 A. DASRATH

2 registrar's office and in the transcript
3 within two weeks?

4 A. I did see postings to that
5 issue in Dominica and I believe Ross has its
6 own internal regulations.

7 Q. What are the postings that you
8 are referring to about this regulation?

9 A. That the students' grades will
10 be posted as soon as possible.

11 Q. What are the postings that you
12 are referring to? Where does it say that is
13 what I'm saying?

14 A. It is posted on the registrar's
15 door in Dominica.

16 Q. You said that Ross has its own
17 internal policies as to when it should post
18 and report grades on the transcript?

19 A. That is what I recall as Ross
20 policies that grades will be posted as soon
21 as possible.

22 Q. Where is this policy?

23 A. This policy was posted as the
24 door at the registrar's office in Dominica.

25 Q. Are there any other places that

1 A. DASRATH

2 these policies are listed, to your knowledge?

3 A. I don't know.

4 Q. After you received this

5 transcript, did you discuss it with

6 anybody?

7 A. Yes.

8 Q. Who did you discuss it with?

9 A. With Mr. George Gilmer.

10 MS. McLAUGHLIN: Mark this

11 document.

12 (Whereupon, the aforementioned

13 letter was marked as Defendants'

14 Exhibit K for identification, as of

15 this date, by the Reporter.)

16 Q. I show you what has been marked

17 as Exhibit K. It is a letter dated May 31st,

18 2006 from Mr. George Gilmer, to Dr. Perri

19 regarding Anand Dasrath.

20 Have you had a chance to look

21 at this?

22 A. Yes.

23 Q. In this letter about three

24 sentences in, it states I have been advised

25 that your school has wrongly denied Mr.

1 A. DASRATH

2 Dasrath the opportunity to return to the
3 clinical rotation in the upcoming sixth
4 semester.

5 Can you explain who denied you
6 the opportunity to return to the clinical
7 rotation in the upcoming sixth semester?

8 A. Ross University.

9 Q. Between receiving, requesting
10 your transcript on May 15th and this letter
11 of May 31st, was there any requests to return
12 to the clinical rotation in the sixth
13 semester made by you?

14 A. I informed Mr. Gilmer that they
15 haven't yet posted a grade for my AICM
16 course, which is stopping my progress. This
17 is what he is referring to.

18 Q. When you say they haven't
19 posted, they posted on the web site, but not
20 on the transcript; is that correct?

21 A. That is correct.

22 Q. Did anyone deny you, from Ross,
23 did anyone tell you that you could not return
24 for the upcoming sixth semester?

25 A. Well, Dr. Perri is not

123

1 A. DASRATH

2 responding, Dr. Fernandez is not responding
3 and I presume they're blocking me.

4 Q. It also says that Mr. Dasrath
5 has requested a return of the money he
6 invested in your program.

7 Who did you ask for the return
8 of money from?

9 A. I mentioned it to Mr. Gilmer if
10 they just were going to operate like this.
11 How could I get back my money. So, he is
12 mentioning it to the school.

13 Q. I meant did you personally
14 request a return of your tuition payments?

15 A. No.

16 Q. Do you know if anyone spoke to
17 Mr. Gilmer after he sent this letter on May
18 31st, 2006?

19 A. To my knowledge, I don't know
20 of anyone speaking to him.

21 MS. McLAUGHLIN: I'm going to
22 mark this as Exhibit L.

23 (Whereupon, the aforementioned
24 letter was marked as Defendant's
25 Exhibit L for identification, as of

124

1 A. DASRATH

2 this date, by the Reporter.)

3 Q. This letter is marked Exhibit L
4 and it is dated June 3rd, 2006 from Mr.
5 Gilmer to Dr. Perri. It discusses following
6 up on a May 30th letter which we just
7 reviewed and subsequent conversations he had
8 with your office, meaning Dr. Perez' office.

9 Do you know what those
10 conversations were about?

11 A. I just see what is written here
12 that he is informing them that they should do
13 something about this, but nobody is doing
14 anything.

15 Q. Did you provide a release as
16 requested in this letter?

17 A. Yes.

18 Q. Did you receive any information
19 after the release was provided from the
20 school?

21 A. No, no information.

22 Q. Do you know if Mr. Gilmer spoke
23 to the school further after this letter of
24 June 3rd, 2006?

25 A. I don't believe so. I don't

1 A. DASRATH

2 know.

3 Q. At some point after this
4 letter, the Queens County lawsuit was filed,
5 the Supreme Court matter?

6 A. Yes.

7 Q. Do you know if there were any
8 conversations with the school before that
9 lawsuit was filed, either by you or Mr.
10 Gilmer?

11 A. I don't recall having
12 conversations and I don't know what
13 conversations if he had or what he had.

14 Q. Did you have any conversations
15 with the school from the point that you spoke
16 to Dr. Perri around May 8th and the time of
17 the filing of the Supreme Court matter?

18 A. I don't recall.

19 Q. Did they send you any
20 information or letters?

21 A. I didn't receive -- apart from
22 the transcript I received it May 22nd, I
23 don't think I received anything else.

24 Q. Did you call them or anybody at
25 Ross during that time period?

126

1 A. DASRATH

2 A. I don't recall.

3 Q. Did you call anyone concerning
4 your status?

5 A. I don't recall.

6 Q. Did you call about
7 re-registering for the AICM course for the
8 May 22nd start date?

9 A. I never called to re-register.
10 They decide if they register, who they
11 register and we don't have access to
12 registration procedures in their computer.

13 Q. So, the first time that you
14 failed -- when you fail the genetics class
15 in the first semester, did you have to retake
16 that immediately after failing?

17 A. Yes.

18 Q. And did you register for it?

19 A. They did it.

20 Q. And how did that work?

21 A. They register and tell you to
22 pay a certain amount of money. They send you
23 a bill.

24 Q. Were you sent a bill after the
25 end of the May 2006 semester?

1 A. DASRATH

2 A. No.

3 Q. You weren't sent any further
4 bills?

5 A. No.

6 Could you repeat the last
7 question.

8 MS. McLAUGHLIN: Repeat it for
9 me.

10 (Whereupon, the referred to
11 question was read back by the
12 Reporter.)

13 A. The semester had ended in April
14 and not May.

15 Q. I'm sorry. After the end of
16 the April semester --

17 A. I did not receive any bills or
18 pre-registration material.

19 Q. What is the NBME?

20 A. NBME, that is the National
21 Board of Medical Examination.

22 Q. Is that an exam that you
23 took?

24 A. Yes.

25 Q. When did you take that?

1 A. DASRATH

2 A. In the spring of 2006.

3 Q. When in the spring of 2006?

4 A. It was close to the end OF the
5 semester. I don't recall the exact date. I
6 believe it's March the 6th. I would have to
7 look that up.

8 Q. Did you pass that exam?

9 A. Yes.

10 Q. When did you receive your
11 passing score?

12 A. Shortly after that.

13 Q. Is it a fair statement that the
14 NBME and the AICM course is required in order
15 to sit for the USMLE course?

16 A. Yes.

17 Q. You had to have passed both of
18 those components in order to sit for the
19 USMLE?

20 A. Yes.

21 Q. As of March or shortly
22 thereafter you had passed the NBME?

23 A. Yes.

24 Q. Around that time were you
25 applying to take the USMLE?

129

1 A. DASRATH

2 MR. COSTELLO: USMLE step I.

3 MS. McLAUGHLIN: Yes, step I.

4 USMLE step I.

5 Q. Around the time that you took
6 and received your score in the NBME were you
7 applying to take the USMLE step I?

8 A. Yes.

9 MS. McLAUGHLIN: We will mark
10 these two documents, please.

11 (Whereupon, the aforementioned
12 two USMLE applications were marked as
13 Defendant's Exhibits M and N for
14 identification, as of this date, by the
15 Reporter.)

16 Q. I'm going to ask you to take
17 take look at what has been marked as
18 Defendant's M and N.

19 MR. COSTELLO: Before you go I
20 want to make a statement on the
21 record.

22 I have what has been introduced
23 as Defendant's Exhibits M and N.
24 Exhibit M looks like it's a USMLE
25 application, page seven of seven.

130

1 A. DASRATH

2 And Exhibit N is also a USMLE
3 application dated May 5th, 2006.

4 I'm going to go back, Exhibit M
5 is dated it looks like March 20th,
6 2006.

7 Both of these applications are
8 page seven of seven.

9 Defendant's counsel has only
10 produced page seven. Therefore I'm
11 calling for production of pages one
12 through six of these applications.

13 MS. McLAUGHLIN: Let's state
14 for the record you produced to me these
15 documents so I don't know if they came
16 from Mr. Dasrath's file, if he has
17 pages one through six. That is what I
18 was going to ask him where the
19 remainder of the record is.

20 If we have them, I will check,
21 if not already produced. I don't know
22 if we maintained a copy in our file.

23 MR. COSTELLO: Would your
24 client be able to --

25 MS. McLAUGHLIN: I will take a

1 A. DASRATH

2 look.

3 Q. We are taking a look at Exhibit
4 M and N which appears to be pages 7 of 7 of
5 an application to take the USMLE step I, am I
6 correct?

7 A. Yes.

8 Q. Do you recall -- let me start
9 by saying is that your signature on each of
10 these documents?

11 A. Yes.

12 Q. The first one, is dated March
13 20th, 2006?

14 MR. COSTELLO: It is actually
15 dated March 23rd. It was signed by my
16 client on March 12th and signed by
17 Bridget Sena on March 20th.

18 Q. Was this a part of your package
19 to apply for the USMLE in March of 2006?

20 A. Yes.

21 Q. And then the second document in
22 Exhibit N, the part that you signed it on
23 April 22nd, 2006 and it was signed by Bridget
24 Seena?

25 A. On May 5th, 2006.

1 A. DASRATH

2 Q. Is there also a package, part
3 of your package of an application to take the
4 USMLE step I?

5 A. Yes.

6 Q. Do you know why there are two
7 different applications here?

8 A. Yes.

9 Q. What is the difference between
10 the two applications, if you know?

11 A. The first one was submitted on
12 March the 12th, 2006. At the recommendation
13 of Dr. Enrique Fernandez.

14 Q. To sit for the USMLE at that
15 point you to have apply; is that correct?

16 A. Yes.

17 Q. Is that stated in any
18 regulations or handbooks of the school that
19 you know of?

20 A. Yes.

21 Q. And so in March of 2006 you
22 applied to take the USMLE; is that correct?

23 A. Yes.

24 Q. And then in May 2006, there is
25 a second application.

133

1 A. DASRATH

2 Do you know why there is a
3 second application to take the exam?

4 A. Yes.

5 Q. Why is that?

6 A. The second application has to
7 be filled out again because the first
8 application was rejected.

9 Q. Why was it rejected?

10 A. They wanted to verify my date
11 of birth.

12 Q. What is your date of birth?

13 A. November 12th, 1957.

14 Q. And the first application was
15 that missing or was it incorrect?

16 A. To my knowledge, it was
17 correct.

18 Q. And they asked for a new
19 application to be sent there?

20 A. Yes.

21 Q. Who asked for that new
22 application to be sent?

23 A. The USMLE office.

24 Q. Is that the examining board?

25 A. Yes.

1 A. DASRATH

2 Q. ECFMG?

3 A. Yes.

4 Q. So, they asked for a new
5 application to be provided?

6 A. Yes.

7 Q. During the time that these two
8 applications were completed both the March
9 and May application you were enrolled in the
10 AICM course; is that correct?

11 A. No.

12 Q. You were not?

13 A. No. The first one I was
14 enrolled. The second one I already finished
15 it.

16 Q. Because it completed on April
17 7th, 2006?

18 A. Yes.

19 Q. Were you enrolled in the school
20 as of May 5th, 2006?

21 A. Yes. Not in the AICM course.
22 The course was over.

23 Q. Did there come a time when you
24 actually took the USMLE step I exam?

25 A. Yes.

1 A. DASRATH

2 Q. When was that?

3 A. July 27th, 2006.

4 Q. From the time you applied in or
5 about May 2006 to the time you sat for the
6 exam in July of 2006, did you have any
7 conversations with the ECFMG board?

8 A. No.

9 Q. Did you have any correspondence
10 from them?

11 A. No.

12 Q. Did you notify them of your
13 failing grade in the AICM class?

14 A. I didn't receive a failing
15 grade from the AICM class yet, from the
16 registrar's office.

17 MS. McLAUGHLIN: I would like
18 to mark the next exhibit.

19 (Whereupon, the aforementioned
20 affidavit was marked as Defendant's
21 Exhibit O for identification, as of
22 this date, by the Reporter.)

23 Q. I show you what has been marked
24 as Exhibit O. It appears to have the caption
25 of Dasrath versus Ross University in the

1 A. DASRATH

2 Supreme Court County of Queens.

3 It is entitled affidavit in
4 support. I ask you to take a look at the
5 second page of the document. And I ask you
6 if that is your signature or a copy of your
7 signature?

8 A. Yes, that is my signature.

9 Q. Do you recall signing this
10 affidavit in or about July 19th of 2006?

11 A. Yes.

12 Q. And this affidavit was in
13 connection with the lawsuit filed in the
14 Supreme Court of Queens County?

15 A. Yes.

16 Q. This lawsuit was filed prior to
17 you sitting for the USMLE exam?

18 A. Yes.

19 Q. Do you recall why you filed the
20 lawsuit?

21 A. I still didn't receive any AICM
22 grade from the registrar's office.

23 Q. In this affidavit, paragraph 3,
24 it says although -- it says I am currently
25 registered for the USMLE step I exam,

1 A. DASRATH

2 although the school has informed me that they
3 will withdraw their sponsorship.

4 This informed you that they
5 will withdraw their sponsorship?

6 A. I don't recall.

7 Q. How did you find that out?

8 A. I don't recall.

9 Q. It says also I will not be able
10 to take the test.

11 Why is that?

12 A. If they issue a failing grade
13 before I take the test from the registrar's
14 office.

15 Q. You will not be able to take
16 the test if they issue a failing grade in the
17 AICM course?

18 A. From the registrar's office,
19 yes.

20 Q. What do you mean from the
21 registrar's office?

22 A. If I get a transcript with a
23 failing grade I will not be able to take the
24 USMLE step I.

25 Q. Why were they withdrawing their

1 A. DASRATH

2 sponsorship of you to take this test?

3 A. They were holding back the AICM
4 grade.

5 Q. They were holding the back?

6 A. Yes.

7 Q. But you knew about the grade
8 from the web site; is that correct?

9 A. That wasn't an official grade.

10 Q. Paragraph six says I wish to
11 enroll in the school and have the defendant
12 respond to me for the USMLE exam.

13 Did you ever communicate that
14 wish to the school?

15 A. That is why I was talking to
16 Dr. Perri.

17 Q. Did you reapply?

18 A. I have to -- I don't reapply.
19 How do I reapply? I'm waiting for them to
20 give me my grade. I don't have a grade yet.

21 Q. But you were told that you
22 failed the AICM course?

23 A. This was posted on an
24 unofficial site.

25 Q. In paragraph eight, it says the

1 A. DASRATH

2 document attached to this motion show I was
3 wrongfully withdrawn from defendant's
4 school.

5 When were you withdrawn from
6 the school?

7 MR. COSTELLO: You have the
8 documents attached to this motion.

9 MS. McLAUGHLIN: I don't have
10 it before me, but if he recalls when he
11 was withdrawn.

12 A. I was withdrawn on June 29th,
13 2006.

14 Q. Was that an administrative
15 withdrawal?

16 A. On June the 29th, 2006 it was
17 an administrative withdrawal, yes.

18 Q. And does that prevent you from
19 sitting for the USMLE step I exam?

20 A. To my knowledge, no.

21 Q. It does not?

22 A. No.

23 Q. Do you have to be sponsored in
24 order to a take the USMLE step I exam by Ross
25 University?

1 A. DASRATH

2 A. Yes.

3 Q. And you were not being
4 sponsored at that time; is that correct?

5 At the time of this affidavit I
6 should say; is that correct?

7 A. Well, the regulation says
8 withdrawn may take or retake the board.

9 Q. Are you talking about the
10 handbook?

11 A. Yes.

12 MS. McLAUGHLIN: Let's mark the
13 handbook.

14 (Whereupon, the aforementioned
15 handbook was marked as Defendant's
16 Exhibit P for identification, as of
17 this date, by the Reporter.)

18 Q. I marked as Defendant's Exhibit
19 P is the Ross University School of Medicine
20 Students handbook of academic rules and
21 regulations, May 2006.

22 Mr. Dasrath, have you reviewed
23 this document?

24 A. Yes.

25 Q. Have you seen this before?

141

1 A. DASRATH

2 A. Yes.

3 Q. And these were the regulations
4 you referred to in the answer to the last
5 question?

6 A. Yes.

7 Q. I direct your attention to page
8 fourteen.

9 In the last paragraph it says
10 that students administratively withdrawn and
11 have not passed the USMLE on their first or
12 second attempts may request to be sponsored
13 to take or retake the USMLE, is that the
14 paragraph that you are referring to?

15 A. And I'm also referring to page
16 nine which says that students remain
17 registered after the AICM course for the next
18 seventeen weeks.

19 So, the remainder of that
20 sentence where it says student on
21 administrative leave withdrawn may request to
22 be sponsored to take or retake the USMLE
23 through a process of application made through
24 the university's admission office?

25 A. Yes.

142

1 A. DASRATH

2 Q. Did you reapply at any point
3 through today?

4 A. I was blocked as of August the
5 14th and did not reapply to retake the USMLE
6 step I.

7 Q. Why were you blocked?

8 A. The school sent a letter to the
9 USMLE blocking the release of my score.

10 Q. So, you actually sat for the
11 exam even though you weren't sponsored to
12 take the exam?

13 A. I was sponsored to take the
14 exam.

15 Q. You were sponsored by Ross
16 University?

17 A. Yes.

18 Q. Your affidavit that we just
19 went over earlier said that Ross withdraw its
20 sponsorship for you to take the exam?

21 A. In the administrative
22 withdrawal letter it does not state that Ross
23 withdraw it's sponsorship to take the exam.

24 Q. But if you aren't enrolled in
25 the University can you sit for the USMLE

1 A. DASRATH

2 exam?

3 A. None of the students taking the
4 exam were enrolled at the time.

5 Q. Is that your page nine you are
6 referring to?

7 A. Yes.

8 Q. Let's take a look at page
9 nine. And there is the course handbook under
10 clinical science segment that says following
11 the twelve-week AICM there is a
12 seventeen-week scheduled break.

13 Is that what you are referring
14 to?

15 A. Yes.

16 Q. Despite the letter announcing
17 administrative withdrawal, you believe you
18 were on a break during that seventeen-week
19 period?

20 A. I was on a break.

21 Q. And you were not
22 administratively withdrawn when you sat for
23 the USMLE in July of 2006?

24 A. The letter never said -- the
25 letter never mentioned anything that they

144

1 A. DASRATH

2 withdrew their sponsorship for the USMLE.

3 MS. McLAUGHLIN: Let's break

4 for lunch at this time.

5 (Whereupon, a luncheon recess

6 was taken.)

7 AFTERNOON SESSION.

8 MS. McLAUGHLIN: Back on the

9 record.

10 Let's mark this document,

11 please.

12 (Whereupon, the aforementioned

13 letter was marked as Defendant's

14 Exhibit Q for identification, as of

15 this date, by the Reporter.)

16 Q. I would like you to take a look

17 at what has been marked as Defendant's

18 Exhibit Q is a letter dated June 29th, 2006

19 from Ross specifically from Michael Rendon.

20 Have you seen this letter

21 before?

22 A. Yes.

23 Q. Did you see it on or about June

24 29th, 2006?

25 A. Shortly thereafter.

1 A. DASRATH

2 Q. The first line of it says I
3 regret to inform you that effectively
4 immediately I have been effectively withdrawn
5 from the Ross School of Medicine.

6 Do you see that?

7 A. Yes.

8 Q. And after this letter was
9 received you sat for USMLE exam, is that
10 correct?

11 A. Yes.

12 Q. Was it a requirement to first
13 take the USMLE exam that you be enrolled in
14 Ross University at time of exam?

15 A. I was never informed of that.

16 MS. McLAUGHLIN: We will mark
17 another exhibit.

18 (Whereupon, the aforementioned
19 letter was marked as Defendant's
20 Exhibit R for identification, as of
21 this date, by the Reporter.)

22 Q. I would like you to take a look
23 at what has been marked as Exhibit R is an
24 August 16th, 2006 letter to Mr. Dasrath from
25 someone from ECFMG, specifically William

146

1 A. DASRATH

2 Kelly.

3 In this letter of August 16th
4 advices Mr. Dasrath that ECFMG is not
5 releasing your score report for the USMLE
6 step one that was taking on July 27th, 2006;
7 is that correct?

8 A. Yes.

9 Q. Had you had correspondence with
10 ECFMG prior to August 16th, 2006?

11 A. I believe this is the first
12 time I get correspondence.

13 Q. Did you contact them prior to
14 August 16th, 2006 other than sitting for the
15 exam?

16 A. No.

17 Q. And the second paragraph says
18 USMLE and ECFMG policy requires a medical
19 school student to be enrolled in medical
20 school both at the time the individual
21 applies for the exam and at the time the
22 individual takes the exam.

23 Do you see that in the
24 letter?

25 A. Yes.

1 A. DASRATH

2 Q. At the time that you applied
3 for the exam, were you enrolled in the
4 University?

5 A. I wasn't enrolled for courses
6 in the University, but I was enrolled to do
7 the board, the USMLE step I.

8 Q. At the time you sat for the
9 exam or at the time that you took the exam,
10 were you enrolled in the University?

11 A. No.

12 Q. And you weren't aware of this
13 policy of USMLE the ECFMG, that you been
14 required to be enrolled at University as the
15 time?

16 A. No.

17 Q. Have you ever received the
18 ECFMG information booklets?

19 A. I don't recall that.

20 Q. This letter says that if your
21 eligibility for an exam changes after you
22 apply, but before you take the exam you must
23 inform ECFMG immediately.

24 Did you ever inform them of the
25 failing grade in the AICM grade?

1 A. DASRATH

2 A. I didn't until August 16th,
3 2006.

4 Q. Because that was of your
5 transition?

6 A. Yes.

7 Q. Did you tell them about the
8 letter of administrative withdrawal of June
9 29th, 2006?

10 A. No.

11 Q. Also ask that you write to them
12 to provide an explanation of why you took the
13 USMLE step I when you weren't enrolled as a
14 medical school student.

15 Did you ever write to them and
16 explain that?

17 A. I didn't write. Maybe the
18 lawyer at the time.

19 Q. Did you see a letter to Mr.
20 Kelly or somebody at ECFMG responding to this
21 letter?

22 A. I don't recall.

23 MS. McLAUGHLIN: I would
24 request a copy of any correspondence
25 with ECFMG.

1 A. DASRATH

2 MR. COSTELLO: To the extent

3 that we have them.

4 MS. McLAUGHLIN: To the extent

5 that you have them.

6 Q. Have you ever had any
7 conversation by phone or otherwise with
8 anybody from ECFMG since you took the test?

9 A. Yes.

10 Q. Do you have letters reflecting
11 those conversations or e-mails?

12 A. I have to check. I have to
13 look around. I'm not sure.

14 MS. McLAUGHLIN: Another
15 request for that.

16 MR. COSTELLO: You will
17 follow-up all requests in writing.

18 MS. McLAUGHLIN: I will.

19 Q. Do you recall what those
20 conversations were about? Did they have to
21 do with release of your score?

22 A. Yes.

23 Q. And did she ever release your
24 score?

25 A. No.

1 A. DASRATH

2 Q. Did you ask them for any other
3 information?

4 A. I don't recall.

5 MS. McLAUGHLIN: Mark this,
6 please.

7 (Whereupon, the aforementioned
8 affidavit in opposition was marked as
9 Defendant's Exhibit S for
10 identification, as of this date, by the
11 Reporter.)

12 Q. I show you what has been marked
13 as Exhibit S as an affidavit in opposition in
14 case of Anand Dasrath versus Ross University
15 in the Supreme Court, County of Queens.

16 It appears to be Mr. Dasrath's
17 affidavit. Have you read that affidavit?

18 MR. COSTELLO: In its
19 entirety?

20 MS. McLAUGHLIN: Has he had a
21 chance to read it?

22 Q. Take your time. Have you had a
23 chance to read the affidavit?

24 A. Yes.

25 Q. On page five is that your

1 A. DASRATH

2 signature from October 25th, 2006?

3 A. Yes.

4 Q. Do you recall signing this
5 affidavit at the time that it was signed?

6 A. Yes.

7 Q. On page one, paragraph three it
8 says that defendant is wrongly claiming I was
9 not enrolled as a medical student when I took
10 the exam.

11 Can you explain the basis of
12 that statement?

13 A. Administrative letter issued on
14 June the 29th, 2006 specifically states that
15 if the student is registered for the board,
16 this is a requirement for a student to be
17 enrolled in Ross.

18 Q. The letter from June 29th we
19 have here. Exhibit Q.

20 Can you point to the language
21 that you were just referring to?

22 A. In order for a student to
23 remain enrolled with RUSM, they must either
24 be registered for courses and/or registered
25 for the board. I was registered for the

152

1 A. DASRATH

2 board at time.

3 Q. So, you believe that this, that
4 you were actually enrolled in the medical
5 school despite Exhibit Q, the letter?

6 A. I was enrolled in the USMLE for
7 the board.

8 Q. Once a student it says becomes
9 inactive, they are administrative withdrawn
10 from RUSM?

11 A. I was enrolled in the USMLE to
12 take the board. That is what the letter is
13 saying if you are enrolled with the board you
14 are a student.

15 Q. But this says you are no longer
16 eligible for the board because you have been
17 administratively withdrawn?

18 This does not say that but the
19 ECFMG regulation states that you have to be
20 enrolled at the school in order to be
21 eligible to take the board.

22 You believe because you applied
23 to take the board you were officially
24 enrolled at the school?

25 A. I was officially certified by

1 A. DASRATH

2 Ross University to take the board.

3 Q. At the time that you took the
4 board, were you enrolled at the school?

5 A. That is what it is saying.
6 That if you are enrolled with the board, you
7 are enrolled with the school.

8 Q. So, you didn't believe that you
9 were administratively withdrawn?

10 A. The letter has tremendous
11 amount of flaws.

12 Q. Did you register for classes at
13 any other point? Did you return to
14 campus?

15 A. I finished everything. I
16 didn't have to return.

17 Q. So, after April 7th, 2006 you
18 never returned to campus; is that correct?

19 A. I finished the Dominica campus
20 in December 2005 and never returned and don't
21 have to return. I finished all campus work.

22 Q. And you didn't return to Miami
23 after April 7th, 2006, correct?

24 A. I was never invited to return,
25 I was never pre-registered to return, I was

1 A. DASRATH

2 ever asked to return. I don't
3 pre-registration. Ross does
4 pre-registration. I pay a bill when they
5 send me a bill.

6 Q. Do you believe you should have
7 passed the AICM course?

8 A. Yes.

9 Q. But you failed; is that
10 correct?

11 A. That is not correct.

12 MR. COSTELLO: Are you
13 referring to a specific part of Exhibit
14 S?

15 MS. McLAUGHLIN: No, I'm just
16 asking him a question.

17 A. I received the failing grade.

18 Q. But you believe you should have
19 passed, is that right?

20 A. Yes.

21 Q. Did Dr. Fernandez ever demand
22 that you pay him \$10,000?

23 A. He told me in that one
24 conversation to return on campus with
25 \$10,000.

155

1 A. DASRATH

2 Q. What conversation?

3 A. The very one conversation I had
4 with him that he manipulated and sent to the
5 Supreme Court.

6 Q. I'm sorry, the one conversation
7 is that April 24th, 2006?

8 A. Yes.

9 Q. That memorandum that we
10 discussed earlier?

11 A. Yes.

12 Q. And we discussed that
13 conversation, you didn't mentioned that he
14 asked you for \$10,000?

15 A. You didn't ask.

16 Q. I asked you everything that was
17 discussed during that conversation.

18 A. I recall it now you brought it
19 up.

20 Q. And what did he say to you in
21 regard to the \$10,000?

22 A. He wanted me to come there in
23 Miami on a specific date with \$10,000.

24 Q. What date?

25 A. I believe it was May the 22nd.

1 A. DASRATH

2 I am not sure of the date now.

3 Q. And what would the \$10,000 be
4 for?

5 A. I have no clue.

6 Q. Did you discuss tuition?

7 A. Absolutely not.

8 Q. So, he said to come to Miami on
9 May 22nd --

10 A. Come to his office.

11 Q. Come to his office on May 22nd
12 with \$10,000?

13 A. Yes.

14 Q. And that's all that was said or
15 was there anything else said in that
16 conversation?

17 A. I don't recall any other
18 conversation.

19 Q. What was your response?

20 A. I did not respond to it.

21 Q. Did you report that to
22 anyone?

23 A. I don't recall reporting it to
24 anyone.

25 Q. Did you discuss it with anyone

1 A. DASRATH

2 at any time?

3 A. I don't recall discussing it.

4 Q. Paragraph eight, page three.

5 It says even assuming arguendo, that I did
6 fail the AICM class that should not have
7 prevented me from taking the USMLE step one
8 according to the Ross student's handbook
9 passing it, NBME comprehensive exam is the
10 prerequisite for taking the step one exam.

11 Is that a true statement?

12 A. The NBME is the prerequisite
13 for taking the USMLE step I.

14 Q. What does that mend
15 prerequisite?

16 A. The first one is passing all
17 the basic science courses in Dominica. The
18 second prerequisite is passing the ACIM
19 course in Miami. And the third prerequisite
20 in that order is passing the NBME, as stated
21 in that handbook on page thirty.

22 Q. In this affidavit on the next
23 page where you say on the merits of my NBME
24 score I was fully eligible to take the USMLE
25 step I exam.

1 A. DASRATH

2 Is that despite if you failed
3 as you said earlier the AICM course?

4 A. I did not receive a failing
5 grade in the AICM course. It is not logical
6 that I would have received a failing course,
7 a failing grade in AICM course.

8 The AICM course is a
9 prerequisite for the NBME.

10 Q. The AICM is a prerequisite to
11 take?

12 A. It precedes the NBME.

13 Q. I thought you said you took
14 that in March of 2006?

15 A. Yes.

16 Q. How is the AICM a prerequisite
17 for the NBME?

18 A. It was approved by Dr.
19 Fernandez and I was given special permission
20 for taking it. The real date for taking it
21 was April 27th of 2006. The scheduled date
22 for taking the NBME was April the 27th. I
23 was given special permission to take it on
24 March the 6th, 2006.

25 Q. But you also have to pass the

1 A. DASRATH

2 AICM course to take the USMLE step I; is that
3 correct?

4 A. Yes, and this is done by Dr.
5 Fernandez who approved the application
6 form. He gave me the application form, he
7 approved it, checked all his records and he
8 forwarded it to the New Jersey office.

9 Q. The application for what?

10 A. The application for the USMLE
11 step I and the application for the NBME.

12 MS. McLAUGHLIN: I'm going to
13 mark the amended complaint.

14 (Whereupon, the aforementioned
15 amended complaint was marked as
16 Defendant's Exhibit T for
17 identification, as of this date, by the
18 Reporter.)

19 Q. Before we go through the
20 amended complaint I just want to clarify and
21 just make sure we are all on the same page.

22 Mr. Dasrath, you are aware of
23 an order of this court dismissing some of
24 causes of action in the amended complaint?

25 A. Yes.

1 A. DASRATH

2 Q. And the only cause of action
3 that is still viable is the breach of
4 contract clause of action?

5 A. Yes.

6 Q. To the extent that I'm going to
7 question you about the amended complaint, I'm
8 going to focus my questions on the breach of
9 contract claim.

10 A. Okay.

11 Q. I just wanted you to understand
12 where we will go with this document.

13 A. Okay.

14 Q. In the amended complaint, the
15 second cause of action is a breach of
16 contract claim.

17 Is on page five of eight at the
18 top. In this cause of action you identified
19 or you suggest that Ross has breeched a
20 contract.

21 Can you identify what contract
22 that is?

23 A. Ross University School of
24 Medicine handbook on administrative
25 regulations, the Ross University letter of

161

1 A. DASRATH

2 admission, the two certifications that Ross
3 issued to take the USMLE step I exam. There
4 are probably more.

5 Q. Let's start with the letter of
6 admission. I think it was one of the first
7 documents that we looked at, Exhibit A.

8 You are alleging in this
9 lawsuit that Ross University breeched this
10 letter; is that correct?

11 A. Yes.

12 Q. And what agreement was provided
13 by this letter that you allege?

14 A. When a student gets admitted,
15 officially admitted into a school, a
16 university, the university has an obligation
17 after receiving so much money as I paid, to
18 do its business in a regular fashion.

19 I went there to pay -- I paid
20 my tuition, studied and I didn't deserve to
21 be treated this way where they blocked my
22 obtaining my M.D., blocked the release of my
23 score. I thought that was very unfair.

24 Q. Are there any provisions in
25 that letter that have been breeched or just

1 A. DASRATH

2 generally what you discussed here?

3 A. It's my opinion that this
4 letter gives me the basic right to proceed
5 with my degree and complete it.

6 That is why I paid them so much
7 money. That seems to be my intention for
8 going there, but I was blocked.

9 Q. When you said earlier that you
10 didn't deserve to be treated this way, can
11 you explain what you mean?

12 A. I have suffered a long time
13 waiting for my USMLE score. I have been out
14 of medical school, while some of my
15 classmates are practicing.

16 Q. Are there any other ways that
17 you were treated that you contend is a breach
18 of this admission letter?

19 You said blocked obtaining the
20 score and blocked obtaining your M.D., is
21 that right?

22 A. Yes.

23 Q. Are there any other items?

24 A. Yes, I don't agree with them
25 giving me such a hard time to process my

163

1 A. DASRATH

2 grades. Every semester there was a problem
3 with grades.

4 Q. And those were the items that
5 we talked about earlier?

6 A. Yes.

7 Q. You also said there was a
8 breach of the handbook?

9 A. Yes.

10 Q. Do you remember what provision
11 specifically were briefed of can you speak to
12 them generally?

13 A. Yes.

14 Q. Do you want to take a look at
15 the handbook?

16 A. On page four it says effective,
17 all rules and regulations in this handbook
18 are binding and I thought they would respect
19 that, but it was not respected. Page five to
20 six, it shows you the grading procedure that
21 should have been used for the AICM course,
22 but it wasn't adhered to.

23 On page nine I was entitled for
24 my seventeen week scheduled break without
25 being traumatized, psychologically

1 A. DASRATH

2 traumatized with the withdrawal letters and
3 all the other things that they did. Other
4 students had their seventeen week break. I
5 had a very hard time.

6 On page thirteen it states the
7 students became eligible to take a USMLE step
8 I when they have passed all courses in the
9 basic science curriculum.

10 Students become eligible to
11 take the USMLE step I when they have passed
12 all courses in the basic science curriculum
13 successfully completed the advanced
14 introduction to clinical medicine,
15 integration clinical medicine, and have
16 passed the NBME comprehensive science exam.

17 Q. You thought that was a
18 provision that was breached?

19 A. Yes.

20 Q. Because why?

21 A. Because I get to the point
22 where I passed the NBME and I was invited, I
23 was congratulated and invited by Ms. Bridget
24 to apply for a part of the USMLE part one.

25 I then went to Dr. Enrique

1 A. DASRATH

2 Fernandez who give me an application for him,
3 I give him the application form and he
4 checked all his records to make sure
5 everything was okay to take the USMLE step
6 I.

7 I took the USMLE step I and the
8 day before the grade was released, Bridget
9 Seena turned around and blocked my release by
10 stating in a letter to the USMLE no longer
11 eligible, withdrawn. That was a direct quote
12 from Bridget Seena's letter to the USMLE and
13 since then I haven't seen my score yet.

14 On page fourteen there is
15 provision for Ross to sponsor students for
16 the USMLE even though they are withdrawn.

17 It is stated here that students
18 may retake the USMLE even though they are
19 withdrawn but Ross turned around and blocked
20 the release of my score from the USMLE.

21 Q. Do you have to do anything
22 further? They say they, my sponsors to take
23 or retake the USMLE.

24 That is a binding agreement
25 that they have to sponsor you?

1 A. DASRATH

2 MR. COSTELLO: Where are you
3 reading from, counselor?

4 MS. McLAUGHLIN: Page
5 fourteen.

6 A. Page four of the Ross
7 University School of Medicine Students
8 handbook states, specifically states that
9 this handbook is binding.

10 Q. Right.

11 A. But the idea that you are
12 referring to page fourteen where it says
13 students may request to be sponsored or to
14 retake the USMLE.

15 Q. But does that require them to
16 sponsor you?

17 A. They have already sponsored,
18 certified me.

19 Q. Did you go through the process
20 of re-application that is required in order
21 for that request?

22 A. I applied twice and both times
23 it was --

24 Q. Re-application through the
25 University admission office?

1 A. DASRATH

2 A. I can't do that yet until I get
3 the first score. I haven't gotten the first
4 score yet.

5 Q. You mean the USMLE score?

6 A. The USMLE score. Page eighteen
7 it says that students in the clinical phase
8 of the curriculum registered through the
9 office of the dean of clinical sciences in
10 New Jersey.

11 And then turn around and tell
12 me that I didn't apply for registration. It
13 is New Jersey, the office in New Jersey that
14 does registration for courses.

15 I simply pay a bill. I don't
16 have access to their computers. I never
17 did.

18 Q. I'm not understanding. Page
19 eighteen there is a statement that students
20 register through the office in New Jersey?

21 A. Yes.

22 Q. And you are saying that Ross
23 breached that provision by how?

24 A. Ross stated that I didn't show
25 up to campus in Dominica. One of the reasons

1 A. DASRATH

2 why they are withdrawing me.

3 I don't have to show up in
4 Dominica. In a different pay. I'm in a
5 clinical phase. Those in the basic science
6 show up at Dominica within one week of start
7 up. Not me.

8 Q. When you failed the AICM you
9 were supposed to show up in Dominica?

10 A. You claim that I fail the
11 AICM. I didn't say that. I told you they
12 gave me failing grade on August the 14th.

13 On page twenty-three it
14 specifically states that students are
15 withdrawn when they do not return to the
16 campus the following semester.

17 I don't have to return to the
18 campus. I finished all campus work.

19 Q. Okay. Are those the only
20 provisions of this handbook that you believe
21 were breached by Ross?

22 A. More, more. On page
23 twenty-five the University, it states, on
24 page twenty-five it states the University
25 follows the guidelines of the U.S. Family

1 A. DASRATH

2 Educational Rights and Privacy Act.

3 In quotation Ferpa and this
4 includes the right to inspect and review the
5 student's educational records within
6 forty-five days that the University request,
7 receives a request.

8 I haven't yet seen what Ross is
9 claiming that I failed. Despite the fact
10 that Judge Reyes.

11 MS. McLAUGHLIN: I'm going to
12 strike that part from the record
13 because there seems to be some
14 confusion of the settlement discussion
15 I was privy to before Judge Reyes.

16 It is not a factual statement
17 that can be made in this deposition.

18 If you want I can discuss it
19 with you off the record because I know
20 you weren't involved at that point.

21 MR. COSTELLO: I was unaware,
22 you are saying that this took place on
23 settlement discussions?

24 MS. McLAUGHLIN: Yes, and it is
25 Dr. Perri's memo it says for resolving

1 A. DASRATH

2 purposes.

3 MR. COSTELLO: We can discuss
4 this later then.

5 MS. McLAUGHLIN: That is fine.

6 Q. Is there anything else besides
7 that last provision you pointed to on page
8 twenty-five in the handbook?

9 A. Yes. You do not discriminate
10 on page, in your calendar you do not, it says
11 you do not discriminate because of age and
12 several other things, but this is what I
13 incurred all through my studies in Dominica.
14 This is what I incurred in Miami. This is
15 what I'm still enduring.

16 Q. So, it is a breach of the
17 calendar?

18 A. Yes.

19 Q. That is the document that you
20 are referring to.

21 Have you ever had any
22 conversations with Tony Ayubia concerning
23 your allegations against Ross?

24 A. Yes, I called Tony, yes.

25 Q. What kind of conversations have

171

1 A. DASRATH

2 you had with him?

3 A. I asked him to speak to Mr.,
4 Dr. Enrique Fernandez.

5 Q. When was this?

6 A. Sometime late April 2006.

7 Q. What did he say to you?

8 A. He keep telling me that Dr.
9 Fernandez is not available.

10 Q. Did you ever hear anything
11 further from Tony Ayubia on any of these
12 issues?

13 A. No. I don't recall. Say I
14 don't recall.

15 Q. Other then the items that we
16 spoke about are there any other agreement
17 that Ross University purportedly had with you
18 that they breached?

19 A. As I remember there are more,
20 but I do not have the answer to the
21 interrogatory.

22 Q. Would that help you if I showed
23 you that?

24 A. Yes, that would help me.

25 MS. McLAUGHLIN: Let's mark the

1 A. DASRATH

2 interrogatories as the next exhibit.

3 (Whereupon, the aforementioned
4 interrogatories was marked as
5 Defendant's Exhibit U for
6 identification, as of this date, by the
7 Reporter.)

8 A. When I said the calendar I
9 actually meant the academic catalog.

10 Q. Okay, we have a copy of that.
11 And that item was breached as you say because
12 of a discrimination claim that you had?

13 A. Yes.

14 Q. Looking at your interrogatories
15 responses, I actually had a question on
16 number ten.

17 In part, interrogatory ten,
18 part B, you state that release of your score
19 was barred on October 9th, 2009.

20 What happened on October 9th,
21 2009 with USMLE?

22 A. Okay. I had other intention
23 rather than saying release of a score. All
24 I'm saying, prior to this on August the 14th,
25 2006 Bridget Seena sent in a statement saying

1 A. DASRATH

2 no longer eligible, withdrawn?

3 Q. Right.

4 A. That in effect blocked the
5 release of my score, which was supposed to be
6 released the next day and I didn't get it
7 yet.

8 Q. Did something happen on October
9 9th?

10 A. October 9th, 2009 the USMLE
11 office barred me. There was a bar from
12 taking any more examination until I could
13 clear myself with all the Court Orders.

14 So, I am right now barred or
15 blocked or whatever you call it from making
16 any application to the USMLE.

17 Q. Did you apply again to take the
18 exam?

19 A. No.

20 Q. Did you have contact with the
21 USMLE or ECFMG?

22 A. Yes.

23 Q. How did you have contact with
24 them, by letter?

25 A. By letter, yes.

1 A. DASRATH

2 Q. And do you have copies of those
3 letters?

4 A. I'm pretty much sure, yes.

5 Q. And on October 9th, 2009, did
6 they write something to you that barred
7 you?

8 A. They wrote a letter, yes,
9 stating that I may not take or apply for
10 USMLE exams.

11 Q. Is that all it said? Why did
12 it say that? Why did they explain --

13 A. Because Bridget Seena sent a
14 statement to them saying no longer eligible,
15 withdrawn.

16 MS. McLAUGHLIN: I would like
17 to have a copy of that October 9th,
18 2009 letter.

19 MR. COSTELLO: As to the extent
20 we have.

21 Q. Did you receive any other
22 letters from either USMLE or ECFMG after
23 October 9th, 2009?

24 A. Yes.

25 Q. And what did those letters

1 A. DASRATH

2 say?

3 A. That I have to wait until the
4 court case is finished.

5 Q. Have you provided them any
6 information concerning this action?

7 A. Yes. I told them this is, you
8 know, this is not right what they are doing.

9 They put me on hold until the
10 case is finished.

11 Q. Did you provide any
12 documents?

13 A. Yes.

14 Q. What documents?

15 A. The same I provided you.

16 Q. Do you know specifically what
17 you sent them?

18 A. I cannot remember right now.

19 MS. McLAUGHLIN: I would also
20 request copies of whatever documents
21 that were produced.

22 Q. Have you heard any
23 correspondence from them since October 9th,
24 2009?

25 A. There was a correspondence that

176

1 A. DASRATH

2 says they are waiting for a case to finish.

3 So I'm still on hold. I didn't get my score

4 and I can't do any business with them. I'm

5 just on hold.

6 Q. Your interrogatories while we

7 are on this document, number thirteen, you

8 set forth your claimed damages sought in this

9 action.

10 You list items that you are

11 seeking recovery from; is that correct?

12 A. Yes.

13 Q. Is this amount solely for the

14 the breach of contract or for the other

15 claims in the amended complaint?

16 A. For the breach of contract.

17 Q. So, for is breach of contract

18 claim you are claiming \$165,000; is that

19 correct? That is the first one. I know

20 there is more.

21 A. For schooling 165,000.

22 Q. How did you come to that

23 number?

24 A. This is money that I spent for

25 tuition and fees for dormitory housing, books

1 A. DASRATH

2 and supplies, air fare from New York to
3 Dominica and back, from New York to Miami and
4 back, ground transportation in Miami where
5 there is no subway?

6 Relocation, just as it says
7 here and other living expenses.

8 Q. Have you produced any
9 documentation supporting these numbers?

10 A. Nobody requested them.

11 Q. I think I did actually. I
12 refer you to number eleven.

13 MR. COSTELLO: We will provide
14 those.

15 MS. McLAUGHLIN: I request it
16 on the record and I will follow up, we
17 need any documentation that supports
18 your calculations.

19 Q. Your attorney fees and you
20 calculate that by what you paid to your
21 attorneys representing you?

22 A. That is more now because I have
23 been paying since that time.

24 Q. What is that number?

25 MR. COSTELLO: He may have to

1 A. DASRATH

2 go back and check his records. We will
3 supply it.

4 Q. Lost wages and benefits?

5 A. For the time I've been at Ross
6 I have lost an amount of money I could have
7 been working and earning a living.

8 Q. How did you calculate the
9 \$360,000?

10 A. From the time I went to Ross to
11 the time I restarted work, I calculate that
12 based on the past salary I was making.

13 Q. If you had never went to Ross
14 that is how this is calculated?

15 A. Yes.

16 Q. Because you left to go to
17 school full-time?

18 A. Yes.

19 MS. McLAUGHLIN: I will need
20 documentation supporting that.

21 Q. Loss of profession.

22 What does that mean?

23 A. I lost my MD degree.

24 Q. Mental anguish and distress?

25 A. Like I am feeling right now.

1 A. DASRATH

2 Q. Have you seen a doctor
3 concerning the anguish and --

4 A. I seen them a number of times.

5 Q. What are their names?

6 A. I went to Dr. Kevin Ackerman.

7 Q. Where is he located?

8 A. In Nassau County. He used to
9 be on Northern Boulevard but he recently
10 move.

11 Q. Is he a general practitioner or
12 a specialist?

13 A. I think he is a specialist,
14 yes.

15 Q. For what?

16 A. For internal medicine.

17 Q. And you go to see him for
18 what?

19 A. For medical problems.

20 Q. Are any of those problems
21 related to your allegation in this lawsuit?

22 A. I just go to see him for
23 medical problems.

24 Q. Are you suffering medical
25 problems related to the issues in this

1 A. DASRATH

2 lawsuit?

3 A. I have intense stress. The
4 lawsuit brought a lot of intense stress.

5 Q. Anything else?

6 A. Whatever is stated here.

7 Q. Can you explain your seeking
8 damages for the disappointment to family
9 members.

10 Can you explain what that
11 relates to?

12 A. They were very disappointed.

13 Q. And there is no monetary number
14 attached to that?

15 A. We haven't done that yet.

16 Q. How about being ostracized by
17 Ross University.

18 Can you explain what that
19 means?

20 A. I think I was treated like
21 garbage.

22 Q. By who?

23 A. The whole Ross community.

24 Q. Are you talking students,
25 staff?

1 A. DASRATH

2 A. I'm talking about the staff.

3 The administrative staff.

4 Q. Okay.

5 A. Their professors.

6 Q. Other than being treated like
7 garbage by those individuals, are there any
8 other claims for damages concerning being
9 ostracized?

10 A. Well, they blocked me from
11 proceeding with my degree, my M.D. degree and
12 that ultimately created a lot of mental
13 anguish, psychological stress, things of that
14 nature.

15 Q. How did they block you from
16 obtaining your degree?

17 A. They block the release of my
18 score.

19 Q. After receiving your AICM score
20 in August of 2006, was it your understanding
21 that you would have needed to retake the
22 class?

23 A. There was no indication until
24 August the 14th when Ross registrar sent a
25 failing grade. All indication was that I

1 A. DASRATH

2 passed the course.

3 If I can't pass the course they
4 wouldn't certify me to take the USMLE. That
5 was the requirements to take the USMLE.

6 MS. McLAUGHLIN: You rely on
7 certain document letters. I just want
8 to make sure you produced all of them.

9 You rely on, according to this
10 interrogatory response. Transcript
11 which I think you produced so if you
12 have any more I request production.
13 E-mails from Ross University Medical
14 officials you produced so if you have
15 any more please produce them.

16 Any notes from phone
17 conversation. Correspondence from the
18 USMLE office or ECFMG, we discussed
19 that and to produce those and any
20 handouts that were relied upon in
21 responses from Ross University and then
22 you say it.

23 So, if there are any other
24 documents, please produce them and we
25 will follow it up.

1 A. DASRATH

2 MR. COSTELLO: Please follow it
3 up in writing.

4 Q. You mentioned breach in this
5 interrogatory number fifteen, we discussed
6 most of them. Dr. Ronnie Coutinho?

7 A. Yes.

8 Q. What would he know about the
9 allegation in the complaint regarding the
10 breach of contract?

11 A. He was a professor there at
12 Miami and I'm sure he knew what was going on
13 at the time.

14 Q. Dr. Guiterrez we spoke about
15 him earlier; is that correct?

16 A. Yes.

17 Q. Who is Michael Dunbar?

18 A. He was one of the doctors that
19 taught in Miami.

20 Q. What would he know about
21 this?

22 A. They know what was going on.
23 They all knew what was going on.

24 Q. What do you mean by what was
25 going on?

1 A. DASRATH

2 A. What goes on there. That they
3 issued fraudulent failing grades to
4 students.

5 Q. Dr. Thomas Havonic?

6 A. He was also one of the
7 professors there.

8 Q. And does he know anything more
9 then what you discussed about Dr. Dunn, the
10 going on?

11 A. Yes, he knows what is going on.

12 Q. Barbara Troy?

13 A. She also knows what is going
14 on. Mr. William Colly.

15 Q. Have you spoken with him
16 personally?

17 A. Yes, I did have conversation
18 with Kelly.

19 Q. What did you say to him?

20 A. I don't remember the details of
21 the conversations.

22 Q. Do you remember what he told
23 you?

24 A. I don't recall.

25 Q. Did you have any conversations

1 A. DASRATH

2 with Michael Rendin?

3 A. No.

4 Q. What would he know about your
5 contract claims?

6 A. Oh, he sent out the ambiguous
7 administrative withdrawal letter.

8 Q. Dr. Martin we discussed,
9 right?

10 A. Yes.

11 Q. Who is Rosemarie Reardon?

12 A. That is one of Ross staff that
13 received the congratulations letter stating
14 that congratulations, you have passed your
15 NBME exam and you can now take the USMLE step
16 I.

17 Q. So, she received the e-mail as
18 well?

19 A. Yes.

20 Q. Other than that did you have
21 any conversations with her about this lawsuit
22 or the allegations?

23 A. No.

24 Q. Have you had any conversations
25 with Judy, Dr. Nancy Perez' secretary?

1 A. DASRATH

2 A. When I call she answers the
3 phone.

4 Q. Did you talk to her anything
5 substively concerning your claim?

6 A. I just ask to speak to Dr.
7 Perri.

8 Q. Administration of Devry. Are
9 you referring to anyone specifically?

10 A. No, I know that they look over
11 all your work.

12 Q. Have you had communication with
13 anyone at Devry, Inc.?

14 A. No.

15 Q. Is the lawyers that handled
16 this case, are there any other lawyers other
17 than those that appeared in court on this
18 matter?

19 A. No.

20 Q. Claire Cramatta, is she Dr.
21 Fernandez' assistant?

22 A. Yes.

23 Q. Did you have any conversations
24 with her specifically?

25 A. Yes, I had conversation, but I

1 A. DASRATH

2 don't recall. I did ask her to let me speak
3 to Dr. Fernandez, but she declined on a
4 number of times.

5 Q. Did you talk to her substively
6 about your claims in this case?

7 A. I didn't discuss my case with
8 her. I did not.

9 Q. Tony Ayubia, we spoken about
10 him?

11 A. Yes, he is also one of Dr.
12 Fernandez' assistant. I talked to him.

13 Q. And classmates, were there any
14 particular classmates that are knowledgeable
15 about the claims in your lawsuit?

16 A. Not to my knowledge, but they
17 know, they are all asking what happened. Why
18 aren't you a doctor yet.

19 Q. Do you keep in touch with
20 classmates now?

21 A. Not often.

22 Q. Are there any ones that you
23 discussed this lawsuit with?

24 A. No.

25 Q. Have you discussed this lawsuit

1 A. DASRATH

2 with anybody other than who we discussed
3 today and your lawyer obviously?

4 A. No.

5 Q. Have you ever been involved in
6 a lawsuit other than this one?

7 A. Yes.

8 Q. What was that?

9 A. That was against Kings County
10 Hospital.

11 Q. What did that relate to?

12 A. They had owed me money, but
13 they paid me and it was settled. They had
14 owed me overtime money.

15 Q. It was an employment issue?

16 A. Yes.

17 Q. This was prior to you going to
18 Ross University?

19 A. Prior to going to New York
20 Hospital.

21 Q. Were you deposed in that
22 lawsuit?

23 A. I don't recall.

24 Q. Have you ever testified in
25 court?

1 A. DASRATH

2 A. No. Other than when I come and
3 watch what is going on.

4 Q. I mean testify on the witness
5 stand.

6 A. No.

7 MS. McLAUGHLIN: Off the
8 record.

9 (Whereupon, a discussion was
10 held off the record.)

11 MS. McLAUGHLIN: I just have a
12 couple of follow-up questions that I
13 usually ask at the beginning, but I
14 forgot to.

15 Q. Have you ever been arrested?

16 A. No.

17 Q. Convicted of a crime?

18 A. No.

19 Q. Are you under the influence of
20 any drugs or alcohol today that would
21 influence your ability to testify?

22 A. No.

23 Q. Have you ever been expelled
24 from a school?

25 A. No.

1 A. DASRATH

2 Q. Suspended?

3 A. No.

4 Q. Dismissed?

5 A. No.

6 Q. Have you received failing
7 grades from schools other than Ross
8 University?

9 A. No.

10 Q. You never failed a class?

11 A. No.

12 Q. Are you taking classes now or
13 just working at Stonybrook?

14 A. I'm just working.

15 Q. What do you do again?

16 A. I'm a pharmacist.

17

18

19 (Continued on the following
20 page.)

21

22

23

24

25

191

1 A. DASRATH

2 Q. Have you taken any courses
3 since you left Ross University in 2006?

4 A. The courses that I took were
5 for pharmacy. Pharmacy courses to maintain
6 my license.

7 MS. McLAUGHLIN: Thank you. I
8 have no further questions.

9 (Time Noted: 2:20 p.m.)

10

11

ANAND DASRATH

12

13 Subscribed and sworn to
14 before me this ____ day
15 of _____, 2010.

16

17

Notary Public

18

19

20

21

22

23

24

25

1

2

I N D E X

3

WITNESS

EXAMINATION BY

PAGE

4

ANAND DASRATH

MS. McLAUGHLIN

4

5

6

E X H I B I T S

7

DEFENDANT'S

DESCRIPTION

PAGE

8

A

Document

13

9

B

Copy of transcript

20

10

C & D

E-mails

47

11

E

Transcript

57

12

F

E-mail

87

13

G

Memo

99

14

H

E-mail

111

15

I

Letter

115

16

J

Transcript

118

17

K

Letter

121

18

L

Letter

123

19

M & N

USMLE application

129

20

O

Affidavit

135

21

P

Handbook

140

22

Q

Letter

144

23

R

Letter

145

24

S

Affidavit in opposition

150

25

1

2

EXHIBITS : (Continued)

3

T

Amended complaint

159

4

U

Interrogatories

172

5

6

REQUESTS

7

Page

Line

8

23

3

9

38

3

10

105

10

11

130

11

12

149

25

13

149

16

14

174

20

15

177

19

16

182

9

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATION

STATE OF NEW YORK)
: SS.:
COUNTY OF KINGS)

I, GARY J. MEROLA, a Notary Public for
and within the State of New York, do hereby
certify:

That the witness(es) whose testimony as
herein set forth, was duly sworn by me; and
that the within transcript is a true record
of the testimony given by said witness(es).

I further certify that I am not related
to any of the parties to this action by blood
or marriage, and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 4th day of October, 2010.


GARY J. MEROLA

<p>\$</p> <p>\$10,000 [1] 154:22,25 155:14,21,23 156:3,12</p> <p>\$165,000 [1] 176:18</p> <p>\$360,000 [1] 178:9</p> <p>1</p> <p>1/11/2006 [2] 57:21 58:11</p> <p>10 [1] 193:10</p> <p>100 [1] 105:8</p> <p>105 [1] 193:10</p> <p>11 [1] 193:11</p> <p>11427 [1] 4:13</p> <p>11th [2] 48:9 57:21</p> <p>12th [2] 20:11 113:8 114:2 131:16 132:12 133:13</p> <p>130 [1] 193:11</p> <p>149 [2] 193:12,13</p> <p>14th [2] 76:16 98:21 142:5 168:12 172:24 181:24</p> <p>159 [1] 193:3</p> <p>15th [3] 116:11,16 122:10</p> <p>16 [1] 193:13</p> <p>165,000 [1] 176:21</p> <p>16th [2] 145:24 146:3,10,14 148:2</p> <p>172 [1] 193:4</p> <p>174 [1] 193:14</p> <p>177 [2] 1:15 2:9 193:15</p> <p>17th [1] 13:23</p> <p>182 [1] 193:16</p> <p>19 [1] 193:15</p> <p>1957 [1] 133:13</p> <p>1977 [1] 6:18</p> <p>1983 [2] 7:15,25</p> <p>1990 [2] 9:13,14</p> <p>19th [1] 136:10</p>	<p>23 175:24</p> <p>2010 [2] 1:9 194:18</p> <p>20th [2] 2:5 4:12 130:5 131:13,17</p> <p>22nd [13] 89:25 90:4,6 110:2,6 118:23 119:3 125:22 126:8 131:23 155:25 156:9,11</p> <p>23 [1] 193:8</p> <p>23rd [2] 88:8 90:4 131:15</p> <p>24th [2] 100:2,15 108:5 112:12 155:7</p> <p>25 [1] 193:12</p> <p>25th [1] 151:2</p> <p>27th [2] 48:7 135:3 146:6 158:21,22</p> <p>29th [1] 139:12,16 144:18,24 148:9 151:14,18</p> <p>3</p> <p>3 [2] 136:23 193:8,9</p> <p>30 [1] 1:9</p> <p>30th [1] 124:6</p> <p>31st [2] 121:17 122:11 123:18</p> <p>36 [2] 92:18 93:23</p> <p>36/50 [1] 96:13</p> <p>38 [1] 193:9</p> <p>3rd [2] 124:4,24</p> <p>4</p> <p>4 [1] 192:4</p> <p>4th [1] 194:18</p> <p>5</p> <p>5/22/2006 [1] 118:13</p> <p>50 [2] 91:13,14,23</p> <p>5919 [1] 2:5</p> <p>5th [4] 113:25 130:3 131:25 134:20</p> <p>6</p> <p>62 [4] 88:9,11,13,17</p> <p>63 [2] 101:4 102:12</p> <p>6th [2] 128:6 158:24</p> <p>7</p> <p>7 [2] 131:4,4</p> <p>76 [2] 91:13,14,23</p> <p>77 [1] 107:25</p> <p>7th [2] 76:13 80:7 134:17 153:17,23</p> <p>8</p> <p>80s [1] 9:12</p> <p>89-25 [1] 4:12</p> <p>8th [4] 114:4 116:5,9 125:16</p> <p>9</p> <p>9 [1] 193:16</p> <p>9:55 [1] 1:10</p> <p>90s [2] 9:23 105:7</p> <p>94 [1] 107:18</p> <p>97 [2] 107:15,25</p> <p>9th [2] 172:19,20 173:9,10 174:5,17,23 175:23</p> <p>A</p> <p>a.m [1] 1:10</p> <p>ability [1] 189:21</p> <p>able [1] 31:20,23 78:11 130:24 137:9,15,23</p> <p>above [2] 21:14 89:21,23</p> <p>absolutely [1] 156:7</p>	<p>abuse [2] 45:19 74:4</p> <p>academic [2] 10:25 140:20 172:9</p> <p>acceptance [2] 13:8 14:11</p> <p>accepted [1] 8:7</p> <p>access [2] 56:3 78:7,10,11,20 79:8 126:11 167:16</p> <p>accessed [2] 77:18,23 78:16</p> <p>accomplish [1] 49:22</p> <p>according [4] 51:4 103:3 157:8 182:9</p> <p>achieved [1] 110:13</p> <p>acim [1] 157:18</p> <p>ackerman [1] 179:6</p> <p>act [1] 169:2</p> <p>action [2] 159:24 160:2,4,15,18 175:6 176:9 194:14</p> <p>actually [2] 40:23 131:14 134:24 142:10 152:4 172:9,15 177:11</p> <p>added [1] 43:11</p> <p>address [1] 88:23</p> <p>adhered [1] 163:22</p> <p>adjusted [1] 21:15</p> <p>administered [1] 41:8</p> <p>administering [1] 60:20</p> <p>administration [1] 186:8</p> <p>administrative [10] 139:17 141:21 142:21 143:17 148:8 151:13 152:9 160:24 181:3 185:7</p> <p>administratively [4] 141:10 143:22 152:17 153:9</p> <p>admission [2] 141:24 161:2,6 162:18 166:25</p> <p>admissions [1] 12:6</p> <p>admitted [2] 161:14,15</p> <p>admistrative [1] 139:14</p> <p>advanced [2] 69:20 164:13</p> <p>advertisement [1] 13:2</p> <p>advices [1] 146:4</p> <p>advised [1] 121:24</p> <p>advisor [2] 46:11,12,14,17,24 47:5,10</p> <p>affidavit [14] 135:20 136:3,10,12,23 140:5 142:18 150:8,13,17,17,23 151:5 157:22</p> <p>aforementioned [19] 13:16 20:3 47:25 57:13 87:21 99:16 112:23 115:24 118:5 121:12 123:23 129:11 135:19 140:14 144:12 145:18 150:7 159:14 172:3</p> <p>afternoon [1] 144:7</p> <p>age [1] 170:11</p> <p>aggressively [1] 82:21</p> <p>ago [1] 115:4</p> <p>agree [2] 96:9 162:24</p> <p>agreed [2] 3:6,13,18</p> <p>agreement [2] 161:12 165:24 171:16</p> <p>aicm [2] 69:18,19 70:2 71:7,14,18,19 72:2 73:7 76:15 77:4,6,15 82:11,14 83:20 84:12 86:11 88:9,11,13,16,23 91:6 92:12 102:8 105:14 106:2 107:20 108:7,22 109:3,12,19 111:6,25 113:19 117:10 118:20,23 119:11,13 122:15 126:7 128:14 134:10,21 135:13,15 136:21 137:17 138:3,22</p>	<p>141:17 143:11 147:25 154:7 157:6 158:3,5,7,8,10,16 159:2 163:21 168:8,11 181:19</p> <p>aimc [1] 92:21</p> <p>air [1] 177:2</p> <p>alcohol [1] 189:20</p> <p>allegation [2] 179:21 183:9</p> <p>allegations [2] 170:23 185:22</p> <p>allege [2] 21:7 161:13</p> <p>alleged [1] 23:20</p> <p>alleging [1] 161:8</p> <p>allocated [2] 39:18,20,24 73:9,11 91:10,11 96:15</p> <p>allocates [1] 40:25</p> <p>allow [1] 79:20</p> <p>almeida [13] 46:13 48:21 49:8,11,24 50:11,25 53:7 54:5,10 62:14,15,18</p> <p>already [2] 19:3 27:21 67:22 68:17 119:6 130:21 134:14 166:17</p> <p>although [2] 136:24 137:2</p> <p>ambiguous [1] 185:6</p> <p>amci [1] 103:10</p> <p>amended [2] 159:13,15,20,24 160:7,14 176:15 193:3</p> <p>american [2] 73:25 74:2</p> <p>among [1] 78:22</p> <p>amount [2] 39:18 126:22 153:11 176:13 178:6</p> <p>anand [2] 1:13 4:10 85:20 100:11,19,25 121:19 150:14 192:4</p> <p>anatomy [24] 17:8,9 36:13,21 37:3,9,15 39:4,21 40:4,13 41:9 42:11,19 43:3 47:17 49:12,18 50:17 51:16 52:20 53:24 54:5,11</p> <p>and/or [1] 151:24</p> <p>anguish [2] 178:24 179:3 181:13</p> <p>anish [1] 87:10</p> <p>announcing [1] 143:16</p> <p>annoyed [2] 94:5,12</p> <p>another [2] 22:15 25:4 38:18 99:14 145:17 149:14</p> <p>answer [4] 5:3 112:13 141:4 171:20</p> <p>answered [2] 85:18 97:13</p> <p>answers [3] 11:6 94:4 186:2</p> <p>anthony [1] 46:13</p> <p>anybody [2] 33:23 45:25 67:16 121:6 125:24 149:8 188:2</p> <p>apart [1] 125:21</p> <p>appeared [1] 186:17</p> <p>appears [11] 48:6 49:24 57:22 88:6 94:3 113:6 116:23 118:12 131:4 135:24 150:16</p> <p>application [25] 12:10,14 13:7 129:25 130:3 131:5 132:3,25 133:3,6,8,14,19,22 134:5,9 141:23 159:5,6,9,10,11 165:2,3 173:16</p> <p>applications [2] 129:12 130:7,12 132:7,10 134:8</p> <p>applied [2] 11:15 132:22 135:4 147:2 152:22 166:22</p> <p>applies [1] 146:21</p> <p>apply [2] 11:22 111:5 131:19 132:15 147:22 164:24 167:12 173:17</p>
--	--	--	---

<p>174:9 applying [5] 11:18 12:19,22 128:25 129:7 approach [4] 50:16,23 67:10,14 approached [1] 59:4 approaching [1] 67:15 approved [3] 158:18 159:5,7 approximately [2] 9:10 10:16 april [34] 13:23 14:9 36:18,19 37:22, 23,25 51:17 76:13 78:2 80:3,7,21 84:2 88:7 89:25 90:4,6 99:4 100:2, 14 106:7 108:5 112:12 127:13,16 131:23 134:16 153:17,23 155:7 158:21,22 171:6 aren't [2] 142:24 187:18 arguendo [1] 157:5 around [20] 8:3,6 12:19 14:9 23:2 38:9 40:23 47:2 58:8 64:11 71:9 75: 14 97:15 125:16 128:24 129:5 149: 13 165:9,19 167:11 arrested [1] 189:15 arts [1] 7:10 ased [1] 40:19 aspect [1] 41:4 assign [2] 26:16 27:6 assistant [5] 24:3 28:6 50:7 186: 21 187:12 associates [1] 7:23 association [2] 73:25 74:3 assume [1] 12:5 assuming [1] 157:5 astonished [1] 31:12 attached [3] 139:2,8 180:14 attempted [1] 79:24 attempts [1] 141:12 attend [4] 9:11,20 14:14 110:23 attended [1] 10:23 attention [1] 141:7 attorney [1] 177:19 attorneys [1] 177:21 august [27] 17:21 19:24 24:14 32: 23 55:6,9 56:8,11 58:22 64:11,20, 23 68:4 76:16 77:2 98:21 99:7 142: 4 145:24 146:3,10,14 148:2 168:12 172:24 181:20,24 authorized [1] 82:16 automatically [1] 65:7 available [6] 65:14,16 78:19,25 89: 9 171:9 avenue [1] 2:5 average [2] 21:20 22:7 aware [3] 90:9 147:12 159:22 away [5] 18:14 19:16,17 31:15 50: 15 ayubia [3] 170:22 171:11 187:9</p>	<p>bad [1] 102:6 bahar [1] 87:3 bar [1] 173:11 barbara [1] 184:12 barred [4] 172:19 173:11,14 174:6 based [13] 32:6 40:2 41:4,18 42:18 44:21 49:17 60:23 71:16,17 74:17 119:21 178:12 basic [14] 16:2,5,8,20 36:5 63:25 66:2 67:17 69:23 157:17 162:4 164: 9,12 168:5 basis [5] 93:14 95:17 104:17 108: 24 151:11 became [2] 104:4 164:7 become [3] 11:20 111:19 164:10 becomes [1] 152:8 beginning [6] 17:21 24:15 46:18, 24 47:12 189:13 behavioral [1] 52:12 belief [1] 114:16 believe [42] 11:23 19:24 20:25 23: 11 30:2 36:18 37:22 39:15 41:16, 21 43:21 54:22,24 60:9 61:2,25 74: 22,24 76:9 81:11 94:9 98:18,25 99: 8 100:9 101:17 105:3 106:14 110: 17 114:20 120:5 124:25 128:6 143: 17 146:11 152:3,22 153:8 154:6,18 155:25 168:20 believed [1] 43:8 belong [1] 93:3 below [2] 90:6 113:24 benefits [1] 178:4 besides [9] 25:19 27:15,21 34:20 54:4,4 64:7 74:17 170:6 best [12] 2:6 64:19 79:5 better [3] 8:15 17:10 110:13 between [7] 3:6 24:19 35:10 69:4 113:16 122:9 132:9 bill [6] 111:17 126:23,24 154:4,5 167:15 bills [2] 127:4,17 binding [3] 163:18 165:24 166:9 biochemistry [5] 17:5,6 28:19,23, 24 birth [2] 133:11,12 bit [1] 31:11 blank [1] 57:8 block [2] 181:15,17 blocked [12] 142:4,7 161:21,22 162: 8,19,20 165:9,19 173:4,15 181:10 blocking [2] 123:3 142:9 blood [1] 194:14 board [18] 73:24 127:21 133:24 135: 7 140:8 147:7 151:15,25 152:2,7,12, 13,16,21,23 153:2,4,6 boat [1] 45:19 bodies [2] 72:18,24 body [2] 75:16,18 book [1] 44:8 booklets [1] 147:18 books [2] 45:13 176:25 born [1] 6:11 boss [1] 84:24 both [6] 107:12 128:17 130:7 134:8 146:20 166:22</p>	<p>bothered [1] 68:16 bottom [1] 88:21 boulevard [1] 179:9 breach [11] 160:3,8,15 162:17 163: 8 170:16 176:14,16,17 183:4,10 breached [5] 164:18 167:23 168: 21 171:18 172:11 break [11] 5:11,13 35:10,12 79:12 143:12,18,20 144:3 163:24 164:4 breakdowns [3] 89:8,11,13 breeched [3] 160:19 161:9,25 bridget [7] 131:17,23 164:23 165:8, 12 172:25 174:13 briefed [1] 163:11 brooklyn [1] 1:16 brought [2] 155:18 180:4 business [2] 161:18 176:4</p>	<p>change [5] 23:20 25:23 28:11 52: 22 63:3 changed [10] 19:11,14 21:8 26:11 53:3 61:16,20 62:24 71:5,12 changes [2] 52:21 147:21 changing [1] 53:2 charge [4] 26:2 29:16 43:23 56:22 check [5] 90:22,24 130:20 149:12 178:2 checked [2] 159:7 165:4 chemistry [1] 10:4 choice [2] 32:4,6 choose [1] 12:25 circumstances [1] 19:14 citizen [1] 6:14 city [2] 9:18,21 claim [6] 160:9,16 168:10 172:12 176:18 186:5 claimed [1] 176:8 claiming [3] 151:8 169:9 176:18 claims [6] 5:6 176:15 181:8 185:5 187:6,15 claire [1] 186:20 clarify [1] 159:20 class [51] 17:14 22:6 26:18 28:23 30:20 31:6,25 32:5,19 34:21 35:5 40:13,25 44:12 45:9 51:12 54:17 55:11 59:14 60:21 62:3 71:8 74:21 76:12 82:14 86:25 88:23 91:7 96: 21 97:7 103:25 105:15 108:12,13, 17,21 109:9,10,13,18,25 110:5 111: 6,16,18 126:14 135:13,15 157:6 181:22 190:10 classes [18] 7:17 8:19 15:14 17:13, 16 34:12,16,20 35:2 36:20,24 51:14 54:11,15 64:17 80:6 153:12 190:12 classmates [4] 162:15 187:13,14, 20 clause [1] 160:4 clear [1] 173:13 clerkship [4] 82:6,7,10,13 client [2] 130:24 131:16 clinical [21] 31:24 66:8,14 67:11 69: 21 74:20,22 82:6,7,10,13,17 122:3, 6,12 143:10 164:14,15 167:7,9 168: 5 clinicals [1] 110:9 close [1] 128:4 clue [1] 156:5 college [5] 9:18,21,25 12:11 55:22 colly [1] 184:14 come [12] 6:16 21:21 37:7,12 67:19 134:23 155:22 156:8,10,11 176:22 189:2 comes [3] 25:4 28:24 93:8 common [1] 11:8 communicate [3] 86:3 100:22 138: 13 communication [2] 27:15 186:12 community [1] 180:23 compiling [1] 43:24 complain [1] 45:17 complaint [11] 33:8 46:10 159:13, 15,20,24 160:7,14 176:15 183:9 193:3</p>
---	--	--	--

B

complete [4] 47:7 63:6 95:5 162:5 completed [3] 134:8,16 164:13 completing [1] 66:21 component [1] 59:13 components [1] 128:18 comprehensive [2] 157:9 164:16 comprised [2] 73:7 107:20 computer [1] 126:12 computers [1] 167:16 concern [3] 60:7,8 66:16 concerned [6] 59:10 60:3,25 94:3 97:19 102:3 concerning [25] 16:13 18:3 23:20 27:16 33:8 35:18,19 36:24 42:11 46:5 47:16 50:17 54:15 62:11 66: 22 68:13,20 69:10 113:19 126:3 170:22 175:6 179:3 181:8 186:5 concerns [2] 34:23 66:10 concluded [3] 36:17 64:10 100:13 conditions [1] 95:13 conducted [1] 42:18 conferred [1] 100:11 confusing [1] 97:23 confusion [1] 169:14 congratulated [1] 164:23 congratulations [2] 185:13,14 connection [2] 12:13 136:13 considered [1] 28:22 consisted [1] 31:17 contact [6] 49:25 79:24 80:12 146: 13 173:20,23 contacted [1] 47:16 contend [1] 162:17 continually [1] 6:7 continued [1] 190:19 contract [10] 160:4,9,16,20,21 176: 14,16,17 183:10 185:5 conversation [46] 27:9 28:17 31: 14 42:8,21,22 43:15,18 45:14 49:11 50:9,18,22 62:12 69:9 77:12 80:24 81:8 83:3,9 85:2,25 86:5 94:16 99: 10 100:23 102:20 108:4 111:23 112:8 113:16 114:15 115:8 116:9 149:7 154:24 155:2,3,6,13,17 156: 16,18 182:17 184:17 186:25 conversations [28] 12:18 27:15 33:5,20,21 45:25 83:12,14,18 85:6 113:18 116:13 124:7,10 125:8,12, 13,14 135:7 149:11,20 170:22,25 184:21,25 185:21,24 186:23 convicted [1] 189:17 copies [2] 174:2 175:20 copy [19] 18:23 19:5 20:4 22:18,24 37:24 38:17,18 44:6 57:19 79:17 117:23,25 118:2 130:22 136:6 148: 24 172:10 174:17 cornell [1] 8:9 correct [44] 15:11 17:24 21:4,11,12 23:13 27:2 36:3 37:10 39:14,16 41: 20 45:9 56:23 61:13 63:18 65:15 67:20 77:23 89:25 90:9 112:17 117: 15 122:20,21 131:6 132:15,22 133: 17 134:10 138:8 140:4,6 145:10 146:7 153:18,23 154:10,11 159:3 161:10 176:11,19 183:15	correctly [1] 97:14 correspondence [7] 135:9 146:9, 12 148:24 175:23,25 182:17 costello [26] 2:4,4,6 19:9 21:24 22: 20 23:8 47:4 71:18 105:20 129:2, 19 130:23 131:14 139:7 149:2,16 150:18 154:12 166:2 169:21 170:3 174:19 177:13,25 183:2 couldn't [1] 79:20 counsel [2] 3:6 130:9 counselor [1] 166:3 counted [1] 45:3 county [11] 7:19,25 8:13,18 125:4 136:2,14 150:15 179:8 188:9 194:4 couple [1] 189:12 coupled [1] 41:17 course [112] 8:25 22:17 23:21 26: 23 27:13 28:23 30:4,7,11 31:22 32: 12,14,20,22 33:2,9,25 34:2 39:21 40:4 41:5,9,11 42:12,19 43:24 49: 18 51:16,25 53:4,24 54:20 58:16,17 59:5 61:7 63:7 70:2,16,20,25 71:4, 14,22 72:2,20,22 73:7 76:15,15 77: 4,7,15 79:13,16,23 81:14,22 82:11 83:20 84:12 86:11 88:8 92:12,21 93:21 99:2,5,8 102:9 103:10,19,22 104:8 106:2 107:20 108:7,11,16,22 109:3 111:25 113:19 114:19 117: 10 118:20,23 119:3,11,13 122:16 126:7 128:14,15 134:10,21,22 137: 17 138:22 141:17 143:9 154:7 157: 19 158:3,5,6,7,8 159:2 163:21 182: 2,3 courses [32] 14:14 16:13,24 17:2, 24 21:3 34:24 36:9,11 51:22 52:4, 16 55:19 56:14 58:5 63:21 66:11, 13,21 67:17 69:22 70:5,24 147:5 151:24 157:17 164:8,12 167:14 191:2,4,5 court [16] 1:2 3:21 4:25 100:9 102: 25 125:5,17 136:2,14 150:15 155:5 159:23 173:13 175:4 186:17 188: 25 coutinho [1] 183:6 cramatta [1] 186:20 created [1] 181:12 credit [2] 95:19 96:14 credits [2] 16:15,18 crime [1] 189:17 cryo [1] 17:8 cullen [3] 1:15 2:8 4:18 currently [5] 5:16,18 136:24 curriculum [9] 15:24 16:9,21 36:6 64:2 69:24 164:9,12 167:8	56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1,20 86:1 87:1 88:1 89:1, 24 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1,12 101:1 102:1 103:1 104:1 105:1 106:1 107: 1 108:1 109:1 110:1 111:1 112:1 113:1,7 114:1 115:1 116:1 117:1 118:1 119:1 120:1 121:1,19 122:1, 2 123:1,4 124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133: 1 134:1 135:1,25 136:1 137:1 138: 1 139:1 140:1,22 141:1 142:1 143: 1 144:1 145:1,24 146:1,4 147:1 148:1 149:1 150:1,14 151:1 152:1 153:1 154:1 155:1 156:1 157:1 158: 1 159:1,22 160:1 161:1 162:1 163: 1 164:1 165:1 166:1 167:1 168:1 169:1 170:1 171:1 172:1 173:1 174: 1 175:1 176:1 177:1 178:1 179:1 180:1 181:1 182:1 183:1 184:1 185: 1 186:1 187:1 188:1 189:1 190:1 191:1 192:4 dasrath's [2] 130:16 150:16 date [40] 1:9 13:13,19 14:23 15:5 20:6 38:24,25 48:4 57:16 58:6,7,10 71:10 78:13 87:24 99:18 113:2 116: 3,10 118:8 121:15 124:2 126:8 128: 5 129:14 133:10,12 135:22 140:17 144:15 145:21 150:10 155:23,24 156:2 158:20,21 159:17 172:6 dated [16] 13:23 20:11 38:11 48:7,8 57:21 88:7 89:24 113:7 116:15 118: 13 121:17 124:4 130:3,5 131:12,15 144:18 day [7] 44:18,19 76:11 165:8 173:6 191:13 194:18 days [2] 118:14 169:6 dean [5] 24:3 50:3,5,7 167:9 deans [4] 28:6 49:25 51:3 81:3 dear [1] 49:24 death [1] 14:18 december [7] 34:11 35:8 61:19 62: 25 68:6 69:4 153:20 decide [1] 126:10 declined [1] 187:3 defendant [4] 1:14 118:12 138:11 151:8 defendant's [32] 13:17,22 20:5,9 38:9 48:2,5 57:14,18 66:6 87:22 88: 5 99:17 112:24 113:4 115:25 118:6 123:24 129:13,18,23 130:9 135:20 139:3 140:15,18 144:13,17 145:19 150:9 159:16 172:5 defendants' [2] 116:15 121:13 defer [1] 111:24 definitely [1] 38:15 degree [11] 7:8 9:4,7,24 10:3,12 162:5 178:23 181:11,11,16 degrees [1] 9:8 delay [2] 14:23 15:5 delayed [2] 14:19,20 demand [1] 154:21	denied [2] 121:25 122:5 deny [1] 122:22 department [4] 26:2 28:19,25 37: 15 deposed [2] 4:21 188:21 deposition [3] 3:9,18 169:17 desalu [14] 29:16,18,23 31:5,15 32: 10 33:21 56:20,21,25 59:4 60:15,16 62:12 desalu's [1] 62:6 described [1] 69:23 deserve [2] 161:20 162:10 despite [4] 143:16 152:5 158:2 169: 9 details [3] 45:23 113:12 184:20 development [1] 17:8 deviations [1] 100:21 devry [9] 98:17 186:8,13 devryu.net [2] 78:6 114:12 differ [1] 70:3 difference [1] 132:9 different [6] 21:23 73:16,19,22 89: 5,16 132:7 168:4 difficult [1] 98:13 direct [2] 141:7 165:11 directed [1] 47:2 disappointed [2] 61:5 180:12 disappointment [1] 180:8 discriminate [2] 170:9,11 discrimination [1] 172:12 discuss [15] 33:15,19 39:7 50:14 53:18 94:14,18 101:5 121:5,8 156: 6,25 169:18 170:3 187:7 discussed [23] 10:24 11:12 21:3 28:17 31:14 33:6,17 42:2 43:15 48: 20 56:18 114:6 155:10,12,17 162:2 182:18 183:5 184:9 185:8 187:23, 25 188:2 discusses [1] 124:5 discussing [7] 50:10 51:2 54:10 58:17 89:21 115:13 157:3 discussion [6] 23:19 25:8 54:4 110:19 169:14 189:9 discussions [3] 62:5 112:7 169:23 dismissed [1] 190:4 dismissing [1] 159:23 distress [1] 178:24 district [1] 1:2 dkyman [1] 1:15 doctor [4] 11:21 54:4 179:2 187:18 doctor-patient [1] 34:19 doctors [3] 33:6 75:13 183:18 doctrine [1] 17:12 document [21] 13:15,17 14:3,6 20: 13,15 57:12 58:12 87:20 88:10 118: 4 121:11 131:21 136:5 139:2 140: 23 144:10 160:12 170:19 176:7 182:7 documentation [3] 177:9,17 178: 20 documents [13] 12:5,12 47:24 48: 15 129:10 130:15 131:10 139:8 161:7 175:12,14,20 182:24 doing [5] 51:14 75:13 90:17 124:13 175:8
--	--	---	---

D

damages [3] 176:8 180:8 181:8
dasrath [205] 1:13 4:10,14 5:1 6:1
7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:
1 15:1 16:1 17:1 18:1 19:1 20:1 21:
1 22:1 23:1 24:1 25:1 26:1 27:1 28:
1 29:1 30:1 31:1 32:1 33:1 34:1 35:
1 36:1 37:1 38:1 39:1 40:1 41:1 42:
1 43:1 44:1 45:1 46:1 47:1 48:1 49:
1,25 50:1 51:1 52:1 53:1 54:1 55:1

<p>dominica [24] 15:16,17 18:14 19:11 26:7 67:19 69:14 85:22 86:17,18,21 87:9 113:10 120:5,15,24 153:19 157:17 167:25 168:4,6,9 170:13 177:3</p> <p>done [3] 103:12 159:4 180:15</p> <p>door [5] 50:19,20,23 120:15,24</p> <p>dormitory [1] 176:25</p> <p>double [1] 10:11</p> <p>down [4] 58:13 79:12</p> <p>dropped [1] 13:4</p> <p>drugs [1] 189:20</p> <p>due [1] 68:22</p> <p>duly [2] 4:3 194:10</p> <p>dunbar [1] 183:17</p> <p>dunn [1] 184:9</p> <p>during [3] 8:17 16:23 34:13 35:23 47:9 51:21,22 52:5 53:18 54:9 64:7 66:20 69:8 75:10,24 81:7 82:11 84:18 100:23 102:19 103:19,22 104:6 108:4 111:23 112:8,11 125:25 134:7 143:18 155:17</p> <p>dykman [2] 2:8 4:19</p>	<p>13 32:22 34:10 40:25 42:2,7 44:17 80:6 83:8 84:25 96:13,15,22 104:10 106:2 126:25 127:15 128:4</p> <p>ended [4] 35:7 51:17 64:18 127:13</p> <p>enduring [1] 170:15</p> <p>enrique [4] 70:11 132:13 164:25 171:4</p> <p>enroll [1] 138:11</p> <p>enrolled [27] 15:10,24 134:9,14,19 142:24 143:4 145:13 146:19 147:3,5,6,10,14 148:13 151:9,17,23 152:4,6,11,13,20,24 153:4,6,7</p> <p>entail [2] 16:6,9</p> <p>entails [1] 16:10</p> <p>entirety [1] 150:19</p> <p>entitled [3] 99:25 136:3 163:23</p> <p>entry [4] 118:22 119:2,7,9</p> <p>epi [2] 110:16,24</p> <p>epi-dermanolog [1] 91:5</p> <p>epi/biostatic [1] 90:25</p> <p>epi/biostatics [1] 91:3</p> <p>erratic [2] 98:4,9</p> <p>esq [2] 2:6,10</p> <p>esqs [3] 1:15 2:4,8</p> <p>essay [18] 72:9,14,15 92:19,25 93:6,8,10,18,20,23 94:10,15 95:15 101:3,20,21 102:13</p> <p>essays [1] 72:16</p> <p>essentially [1] 100:20</p> <p>even [4] 43:9 142:11 157:5 165:16,18</p> <p>eventually [2] 80:16 85:24</p> <p>everything [4] 79:15 153:15 155:16 165:5</p> <p>exact [3] 71:10 83:2 128:5</p> <p>exactly [7] 25:3 32:16 38:23 58:9 68:16 82:23 103:16</p> <p>exam [88] 21:20 22:6 30:17,21,22,24 31:18 40:7,9,13,21,22 41:18 51:8 52:15 55:8 59:12,19,20,23 60:15 63:11 65:17 67:23 73:14,18,24 74:11 75:21 76:5,7 92:4,6,14,16,25 101:2,2,9,11,13,14,15,18,22,25 102:3,8,13 104:18 105:23 107:21 110:17 127:22 128:8 133:3 134:24 135:6 136:17,25 138:12 139:19,24 142:11,12,14,23 143:2,4 145:9,13,14 146:15,21,22 147:3,9,9,21,22 151:10 157:9,10,25 161:3 164:16 173:18 185:15</p> <p>examination [10] 1:12 4:6 29:5,7,14,17 31:4 127:21 173:12 192:3</p> <p>examinations [1] 29:24</p> <p>examined [1] 4:5</p> <p>examining [1] 133:24</p> <p>exams [42] 17:23 18:3 29:9 30:2,6,12,13 31:21 32:2,3,6 41:8 45:9 51:20 59:16 60:17 61:6 66:23 67:25 68:3 71:25 72:4,6,7,12,15,15 73:10,13,16 74:9,18 75:23 81:16,19 92:7,9,9,22,23 104:9 174:10</p> <p>exan [1] 142:20</p> <p>except [6] 3:13 38:23,25 60:22 97:14 110:23</p> <p>exchange [1] 49:10</p>	<p>exchanges [4] 48:21,23 49:3,7</p> <p>excuse [1] 94:6</p> <p>exempt [1] 110:15</p> <p>exhibit [60] 13:15,18,21,22 20:5,10 38:10 48:7,8 49:23 51:6,7 57:15,18 66:6 87:23 88:5 99:15,17,25 112:20,22,25 113:4 115:23 116:2,10,15 118:4,7,12 121:14,17 123:22,25 124:3 129:24 130:2,4 131:3,22 135:18,21,24 140:16,18 144:14,18 145:17,20,23 150:9,13 151:19 152:5 154:13 159:16 161:7 172:2,5</p> <p>exhibits [9] 48:3,6,11,12,13 51:4 129:13,23 193:2</p> <p>exist [1] 91:18</p> <p>exists [1] 97:3</p> <p>expected [1] 55:10</p> <p>expelled [1] 189:23</p> <p>expenses [1] 177:7</p> <p>experience [1] 119:22</p> <p>explain [12] 19:13 21:7 57:23 98:12 122:5 148:16 151:11 162:11 174:12 180:7,10,18</p> <p>explained [2] 45:21 81:15</p> <p>explaining [1] 53:7</p> <p>explanation [2] 19:15 148:12</p> <p>extent [5] 105:18 149:2,4 160:6 174:19</p> <p>extra [1] 96:14</p>	<p>23,24 111:22 112:4,8,12,14 113:11,17 114:10 115:7 123:2 132:13 154:21 158:19 159:5 165:2 171:4,9 187:3</p> <p>fernandez [4] 77:17 84:24 186:21 187:12</p> <p>ferpa [1] 169:3</p> <p>ferri [1] 114:2</p> <p>few [2] 75:4 85:23</p> <p>fifteen [2] 16:18 183:5</p> <p>fifth [9] 65:21,23 66:21 67:4,18 68:25 74:5,17 100:13</p> <p>file [6] 33:7,12 46:4 62:9 130:16,22</p> <p>filed [6] 46:10 125:4,9 136:13,16,19</p> <p>filing [4] 3:7 33:13 46:8 125:17</p> <p>filled [2] 13:4 133:7</p> <p>final [48] 18:9,16 30:8,17,19,21,22,24 31:17 40:7,9 45:4 52:25 54:21 59:17,23 64:15,21 67:23,25 68:2,2 73:14,15 76:5,7,14 90:13 92:19,25 93:5,8,10,18,20,23 94:14 95:16 101:2,13,14,15,18,25 103:23 104:2 107:19 119:14</p> <p>finally [1] 4:16</p> <p>finals [1] 111:3</p> <p>find [5] 32:13 56:11 59:3 71:11 137:7</p> <p>fine [2] 12:17 170:5</p> <p>finish [2] 5:3 176:2</p> <p>finished [6] 67:16 134:14 153:15,19,21 168:18 175:4,10</p> <p>first [61] 4:3 16:16,25 18:4 20:17 33:9 35:20,24 38:14 48:17 49:23 56:6 62:23 67:7 69:23 77:3,5,16,22 78:15 82:15 84:17 85:11,25 86:4 87:4,6,11,12 91:12 93:19,22 95:10 100:6,10 102:23 106:6,9,12,16,21,25 107:13 113:9 115:2 126:13,15 131:12 132:11 133:7,14 134:13 141:11 145:2,12 146:11 157:16 161:6 167:3,3 176:19</p> <p>five [20] 45:7 72:6,11 73:13,21 74:13 75:23 81:15 82:2,3 92:22 93:2 104:12,22 105:5,12 114:24 150:25 160:17 163:19</p> <p>flaws [1] 153:11</p> <p>focus [1] 160:8</p> <p>follow [7] 21:22 29:22 31:8 38:6 177:16 182:25 183:2</p> <p>follow-up [4] 23:7 113:11 149:17 189:12</p> <p>followed [1] 24:25</p> <p>following [7] 23:9 108:17 109:3 124:5 143:10 168:16 190:19</p> <p>follows [2] 4:5 168:25</p> <p>force [1] 3:20</p> <p>forgot [1] 189:14</p> <p>forgotten [1] 54:7</p> <p>form [3] 1:14 12:10 159:6,6 165:3</p> <p>formal [1] 46:4</p> <p>forth [2] 176:8 194:10</p> <p>forty-five [1] 169:6</p> <p>forwarded [2] 12:13 159:8</p> <p>found [4] 47:13,15 56:6 78:20</p> <p>four [16] 6:4 7:6 16:22 42:5 51:24</p>
--	--	---	---

52:17 54:11 63:17,22,25 64:4,22
75:9 96:12 163:16 166:6
fourteen [4] 141:8 165:14 166:5,12
fourth [1] 65:22
fraudulent [1] 184:3
friday [2] 113:7,25
friends [4] 78:22,23 79:5 86:24
front [1] 97:6
full-time [1] 178:17
fully [1] 157:24
further [13] 3:12,17 9:16 45:14,24
83:11 85:5 124:23 127:3 165:22
171:11 191:8 194:13

G

garbage [2] 180:21 181:7
gary [2] 194:6,21
gather [1] 40:23
gathered [1] 83:3
gathering [1] 40:24
gave [4] 43:5 62:2 159:6 168:12
general [3] 32:18 35:23 179:11
generally [3] 24:21 162:2 163:12
genetic [2] 21:15 31:17
genetics [21] 17:7 18:9,17,21 21:9,
10 22:16 23:21 25:23 26:2 27:13
28:23 30:4 33:9 34:21 35:5,18 64:5
108:12,18 126:14
gentleman [3] 26:25 27:3,4
george [2] 121:9,18
gestures [1] 11:7
gets [1] 161:14
getting [1] 79:7
gilmer [3] 121:9,18 122:14 123:9,
17 124:5,22 125:10

give [15] 18:15 21:18 27:12 55:7 78:
9 94:25 95:2,14,24 97:16 98:9 115:
12 138:20 165:2,3
given [12] 30:7 32:7 44:9 55:6 70:
16 76:2 97:5,7 103:18 158:19,23
194:12
gives [1] 162:4
giving [7] 61:25 96:20,22,24 98:5,6
162:25
goal [1] 11:18
got [2] 93:11 112:16
gotten [1] 167:3
grade [163] 18:9,12,17,18,20 19:14
21:7,9,11,15 22:2 23:12 25:23 26:
12,22 27:16 28:11 29:21,24 30:24
31:2,5,17,21 32:5 33:8,22 35:18,19
37:3,5,6,8,16,18 39:4,7,13 42:11 43:
4,10,24 44:8 45:4,13,25 46:6 47:2,
17 50:17 51:2 52:20 53:3,13,23 54:
5,11,15,19,21 55:3,5,10 56:7 57:3,5
58:19 59:10 60:3 61:15 62:11,16,
24 64:7,22 65:5 66:17,19,23 67:24
68:20 73:6 74:17 76:15,17 77:4,6,
11,15,19,23 78:16,21 79:13,14,22
81:10 82:19 83:5 89:8,11,13,19 90:
9,11,13,13,15,18,25 91:2,13,23 92:
3,12 93:20 94:7,15 95:16 96:10 97:
24 98:3,7,14,17,18,23 100:12 102:
17 103:23 107:19 108:10 110:12
114:12,15,21 117:10,24,25 119:10,

13,14,25 122:15 135:13,15 136:22
137:12,16,23 138:4,7,9,20,20 147:
25,25 154:17 158:5,7 165:8 168:12
181:25
graded [8] 29:11 39:23 73:4 75:19
81:22,24,25 108:3
grades [48] 18:3 20:17,20 21:23 22:
11,14 23:15 29:25 34:24 36:24 45:
8,10,15 49:12 52:21 55:18,23,25 56:
13 58:5 63:21 65:2,14,16 66:11 69:
11 71:15 78:12,18,24 88:8,23 90:11
91:9,9,10 98:5,6,9 104:7 114:11
120:9,18,20 163:2,3 184:3 190:7
grading [3] 56:22 60:21 163:20
graduate [3] 7:14 8:24,25
graduated [1] 9:13
graduation [1] 7:16
great [1] 23:4
grievance [6] 33:7,11,14,15 46:5
62:10
grill [3] 28:3,4,5
gross [20] 36:13,21 37:3,9,15 39:4,
21 40:4,13 41:9 42:11,19 43:3 47:
16 49:12 50:17 51:16 53:23 54:5,
10
ground [2] 4:24 177:4
group [2] 40:24 110:23
guess [3] 10:9 21:6 104:6
guidelines [1] 168:25
guterrez [1] 183:14
gutterrez [1] 70:12
guttery [1] 70:13
guy [1] 90:16
guyana [1] 6:12

H

h-o-u-g-h-t-o-n [1] 24:7
hand [3] 11:7 104:9 194:18
handbook [20] 117:6,18,22,24 118:
2 140:10,13,15,20 143:9 157:8,21
160:24 163:8,15,17 166:8,9 168:20
170:8
handbooks [1] 132:18
handled [1] 186:15
handouts [1] 182:20
happen [2] 78:19 173:8
happened [9] 32:10 63:4,5 71:2 85:
23 92:2 112:11 172:20 187:17
happy [1] 97:16
hard [3] 57:19 162:25 164:5
havonic [1] 184:5
head [2] 28:18 37:14
hear [4] 16:7 85:19 116:5 171:10
heard [4] 85:15,21 87:17 175:22
heart [2] 73:25 74:2
held [2] 1:14 189:10
help [2] 171:22,24
helpful [2] 5:4 11:8
helps [1] 66:6
hereby [3] 3:5,9 194:7
herein [1] 194:10
hereto [1] 3:7
hereunto [1] 194:17
high [2] 105:7 107:12
histology [3] 17:7,11 34:18

hold [3] 175:9 176:3,5
holding [2] 138:3,5
home [4] 22:22 68:2 69:3,9
hospital [15] 7:19,25 8:9,14,16,18,
19 10:15,20 70:18 74:23 75:3,10
188:10,20
hospitals [1] 112:5
houghton [7] 24:4 26:24 27:21 50:
2,4 51:3 52:19
houghton's [1] 25:6
housed [1] 15:20
housing [3] 15:21,22 176:25
human [1] 71:24
hundred [16] 40:16 41:3 43:6,9,22
44:3,11,16 45:3 49:16 55:4,7 59:11
60:4,9,25

I

idea [2] 79:6 166:11
identification [19] 13:18 20:6 48:3
57:15 87:23 99:18 112:25 116:2
118:7 121:14 123:25 129:14 135:
21 140:16 144:14 145:20 150:10
159:17 172:6
identified [1] 160:18
identify [1] 160:21
immediately [7] 80:9,16 108:16
109:14 126:16 145:4 147:23
immunology [2] 52:8 66:9
inactive [1] 152:9
inc [1] 186:13
includes [1] 169:4
incomplete [14] 59:2,6 61:12,16,
22 62:7 63:10 66:24 67:8,11 68:10,
20 71:3,6
incorporate [1] 43:5
incorporated [1] 75:22
incorporating [1] 49:16
incorrect [2] 52:20 133:15
incurred [2] 170:13,14
indication [2] 181:23,25
individual [3] 44:25 146:20,22
individuals [1] 181:7
influence [2] 189:19,21
inform [3] 145:3 147:23,24
information [10] 94:25 96:23 97:4
115:7 124:18,21 125:20 147:18
150:3 175:6
informed [9] 100:19 122:14 137:2,
4 145:15
informing [1] 124:12
inspect [1] 169:4
instead [1] 66:18
instruct [1] 106:15
integration [1] 164:15
intense [2] 180:3,4
intention [2] 162:7 172:22
interested [1] 194:16
internal [3] 120:6,17 179:16
internet [1] 102:15
interrogatories [5] 172:2,4,14
176:6 193:4
interrogatory [4] 171:21 172:17
182:10 183:5
introduced [1] 129:22

introduction [4] 66:8,14 69:20
164:14
invested [1] 123:6
invited [3] 153:24 164:22,23
involved [3] 12:8 169:20 188:5
island [5] 8:23 9:5,11,17 67:16
issue [6] 35:17 59:9 96:5,7 120:5
137:12,16 188:15
issued [10] 18:9,16,18 66:11,18 67:
24 119:15 151:13 161:3 184:3
issues [12] 18:2,6 35:19,22 36:23
37:2 54:14 63:20 64:6 66:22 171:
12 179:25
item [2] 21:14 172:11
items [6] 90:22 101:5 162:23 163:4
171:15 176:10
itself [1] 63:5

J

january [9] 35:16 36:2,12,16 57:21
69:2,4,14 70:9
jennifer [2] 2:10 4:17
jersey [5] 159:8 167:10,13,13,20
job [1] 93:13
john's [3] 6:24 7:5 10:13
joseph [1] 2:6
judge [2] 169:10,15
judy [4] 85:17,18,19 185:25
july [12] 20:11 38:11,14,16,19 48:8
51:7 135:3,6 136:10 143:23 146:6
jumping [1] 38:9
june [10] 48:7 124:4,24 139:12,16
144:18,23 148:8 151:14,18

K

keep [2] 171:8 187:19
kelly [3] 146:2 148:20 184:18
kept [1] 29:12
kevin [1] 179:6
kick [1] 62:21
kind [1] 170:25
kings [6] 7:18,24 8:13,18 188:9 194:
4
knock [1] 50:20
knowing [1] 46:23
knowledge [21] 22:4 29:24 33:10
49:9 60:22 63:10 74:25 79:5 89:15
91:18 102:18 106:16,18 107:12
108:2 110:21 121:2 123:19 133:16
139:20 187:16
knowledgeable [1] 187:14
knows [2] 184:11,13

L

lab [2] 59:19,20
language [1] 151:20
large [1] 110:23
last [19] 7:22 16:21 17:14 44:17,19
63:23 65:25 76:11 87:4,7,11,13,14
96:12 115:2 127:6 141:4,9 170:7
late [12] 9:12,22 24:13 36:19 37:22,
22,25 64:23 78:2 80:21 84:2 171:6
later [2] 108:23 170:4
laugh [2] 25:14,15
laughter [1] 25:19
lawsuit [17] 4:20 5:7 125:4,9 136:

<p>13,16,20 161:9 179:21 180:2,4 185:21 187:15,23,25 188:6,22</p> <p>lawyer [3] 5:11 148:18 188:3</p> <p>lawyers [2] 186:15,16</p> <p>lead [1] 50:19</p> <p>learn [7] 37:7,12 77:10,14 102:11,16,19</p> <p>learned [5] 67:7 77:3,6 102:24 103:24</p> <p>learning [7] 40:20 41:4,18 42:18 44:21 49:17 60:23</p> <p>least [1] 100:16</p> <p>leave [5] 8:13 50:20,21 67:19 141:21</p> <p>leaving [1] 10:19</p> <p>lecture [9] 91:8 96:16,18 97:10,20</p> <p>led [1] 94:8</p> <p>left [5] 21:25 67:22 80:9 178:16 191:3</p> <p>letter [64] 13:8 14:11 21:10 27:17 37:5,8 42:5 46:4 52:22 62:10 115:25 116:21,23 117:3 118:14,17 121:13,17,23 122:10 123:17,24 124:3,6,16,23 125:4 142:8,22 143:16,24,25 144:13,18,20 145:8,19,24 146:3,24 147:20 148:8,19,21 151:13,18 152:5,12 153:10 160:25 161:5,10,13,25 162:4,18 165:10,12 173:24,25 174:8,18 185:7,13</p> <p>letterhead [2] 13:24 20:11</p> <p>letters [7] 125:20 149:10 164:2 174:3,22,25 182:7</p> <p>level [1] 7:23</p> <p>license [1] 191:6</p> <p>line [5] 100:10 113:9 115:2 145:2 193:7</p> <p>list [4] 21:2 90:11 107:6 176:10</p> <p>listed [1] 121:2</p> <p>listen [5] 23:23 25:9,10 27:24 33:11</p> <p>listing [1] 90:16</p> <p>little [1] 31:11</p> <p>live [2] 5:17 82:17</p> <p>living [2] 177:7 178:7</p> <p>located [2] 26:6 179:7</p> <p>location [2] 70:17,19</p> <p>log [1] 91:23</p> <p>logged [5] 89:2,14 90:19 98:16 102:16</p> <p>logical [1] 158:5</p> <p>long [9] 6:2 7:24 8:23 9:5,11,17 17:19 24:19 162:12</p> <p>long-standing [1] 94:13</p> <p>longer [4] 152:15 165:10 173:2 174:14</p> <p>look [37] 13:21 20:9 23:2 48:11 55:22 57:17 74:8 81:9 82:18 84:12,15 85:2 86:12,16 87:25 94:21 95:8 99:21,22 105:6,8 113:3 116:17,19 118:10 121:20 128:7 129:17 131:2,3 136:4 143:8 144:16 145:22 149:13 163:14 186:10</p> <p>looked [2] 26:14 161:7</p> <p>looking [2] 11:19 172:14</p> <p>looks [4] 71:24 103:3 129:24 130:5</p> <p>loss [1] 178:21</p>	<p>lost [3] 178:4,6,23</p> <p>lot [5] 68:17 91:16,20 180:4 181:12</p> <p>lots [1] 91:19</p> <p>low [1] 101:3</p> <p>lower [1] 37:5</p> <p>lunch [1] 144:4</p> <p>luncheon [1] 144:5</p> <p>M</p> <p>m.d [3] 161:22 162:20 181:11</p> <p>made [6] 46:9 52:23 81:11 122:13 141:23 169:17</p> <p>mail [1] 20:25</p> <p>mailbox [1] 13:5</p> <p>mailed [5] 37:19 38:13,15 57:4 65:3</p> <p>maintain [3] 22:24 79:17 191:5</p> <p>maintained [2] 6:7 130:22</p> <p>makeup [1] 51:25</p> <p>managed [1] 77:16</p> <p>manipulated [1] 155:4</p> <p>many [11] 7:4 16:15,19 30:6,12,13 40:3,5 71:23 72:4 95:4</p> <p>march [13] 128:6,21 130:5 131:12,15,16,17,19 132:12,21 134:8 158:14,24</p> <p>mark [18] 13:14 19:25 47:24 57:11 87:19 112:21 115:23 118:4 121:10 123:22 129:9 135:18 140:12 144:10 145:16 150:5 159:13 171:25</p> <p>marked [42] 13:17,22 20:4,9 29:10 48:2,5,12 49:23 51:7 57:14,18 59:5 63:10 66:5 87:22 93:12,25 99:17,25 112:24 115:25 116:15 118:6 121:13,16 123:24 124:3 129:12,17 135:20,23 140:15,18 144:13,17 145:19,23 150:8,12 159:15 172:4</p> <p>marker [1] 94:6</p> <p>marking [2] 59:5 68:11</p> <p>marriage [1] 194:15</p> <p>martin [11] 37:14 39:9,10 41:24 42:9 43:4,13,23 44:15 49:15 185:8</p> <p>marvin [1] 42:15</p> <p>masters [3] 10:5,9,11</p> <p>match [1] 105:9</p> <p>material [1] 127:18</p> <p>matter [6] 102:25 107:24 125:5,17 186:18 194:16</p> <p>mclaughlin [56] 2:10 4:7,18 13:14 19:2,25 22:3,22 23:5 38:5 47:23 57:11 76:19,23 87:19 88:4 99:14 105:10 112:21 115:22 118:3 121:10 123:21 127:8 129:3,9 130:13,25 135:17 139:9 140:12 144:3,8 145:16 148:23 149:4,14,18 150:5,20 154:15 159:12 166:4 169:11,24 170:5 171:25 174:16 175:19 177:15 178:19 182:6 189:7,11 191:7 192:4</p> <p>md [1] 178:23</p> <p>mean [12] 21:16 57:24 58:25 77:8 111:14 119:18 137:20 162:11 167:5 178:22 183:24 189:4</p> <p>meaning [1] 124:8</p> <p>means [9] 88:12,16,17 111:15 180:19</p>	<p>19</p> <p>meant [4] 47:9 88:15 123:13 172:9</p> <p>medical [22] 5:21 8:9 11:21 15:25 17:6,6,11 20:18 30:5 60:18 73:24 127:21 146:18,19 148:14 151:9 152:4 162:14 179:19,23,24 182:13</p> <p>medicine [15] 10:22 15:16 16:11 50:8 66:8,15 67:11 69:21 140:19 145:5 160:24 164:14,15 166:7 179:16</p> <p>meeting [5] 32:9 44:18,20,21 62:6</p> <p>meisenberg [5] 28:21 29:2,14,19,21 31:4,9 32:10</p> <p>member [2] 46:15,16</p> <p>members [1] 180:9</p> <p>memo [9] 99:17,21,23 102:24 103:4 169:25</p> <p>memorandum [2] 100:2 155:9</p> <p>memory [1] 104:17</p> <p>mend [1] 157:14</p> <p>mental [3] 17:8 178:24 181:12</p> <p>mention [1] 115:9</p> <p>mentioned [5] 102:21 115:15 123:9 143:25 155:13 183:4</p> <p>mentioning [1] 123:12</p> <p>merits [1] 157:23</p> <p>merola [2] 194:6,21</p> <p>met [2] 4:16 61:9</p> <p>miami [15] 62:22 69:15 70:17 78:9 80:2 95:23 153:22 155:23 156:8 157:19 170:14 177:3,4 183:12,19</p> <p>michael [3] 144:19 183:17 185:2</p> <p>microbiology [2] 52:8 66:9</p> <p>mid-term [13] 30:8,18 51:11 55:8 59:12,15 60:5 61:2 63:11 101:2,9,11 111:3</p> <p>mid-terms [1] 55:4</p> <p>middle [1] 64:20</p> <p>might [10] 19:7 38:3 53:13 62:21 65:14 81:10,12 82:19 84:2 94:9</p> <p>mind [2] 14:2 23:9</p> <p>mini [2] 51:8 52:15</p> <p>minus [4] 95:15,20 96:2,6</p> <p>missing [1] 133:15</p> <p>monday [1] 89:9</p> <p>monetary [1] 180:13</p> <p>money [10] 123:5,8,11 126:22 161:17 162:7 176:24 178:6 188:12,14</p> <p>montague [2] 1:16 2:9</p> <p>morning [2] 4:14,15</p> <p>most [2] 5:4 183:6</p> <p>motion [2] 139:2,8</p> <p>move [2] 15:17 179:10</p> <p>ms [58] 4:7 13:14 19:2,25 22:3,22 23:5 25:6 26:24 27:21 38:5 47:23 57:11 76:19,23 87:19 88:4 99:14 105:10 112:21 115:22 118:3 121:10 123:21 127:8 129:3,9 130:13,25 135:17 139:9 140:12 144:3,8 145:16 148:23 149:4,14,18 150:5,20 154:15 159:12 164:23 166:4 169:11,24 170:5 171:25 174:16 175:19 177:15 178:19 182:6 189:7,11 191:7 192:4</p> <p>much [7] 27:10 38:2 40:9 107:19</p>	<p>161:17 162:6 174:4</p> <p>multiple [2] 32:3,6</p> <p>must [9] 9:12 51:13 110:22 111:2 147:22 151:23</p> <p>myself [1] 173:13</p> <p>N</p> <p>name [22] 4:8,17 26:4,20,20 34:7,9 57:20 60:12,13 78:4 79:13,16 87:4,5,6,7,11,11,12,13,15</p> <p>names [3] 70:15 87:2 179:5</p> <p>nancy [2] 83:23 185:25</p> <p>nassau [1] 179:8</p> <p>national [3] 73:24 76:9 127:20</p> <p>nature [1] 181:14</p> <p>nbme [17] 127:19,20 128:14,22 129:6 157:9,12,20,23 158:9,12,17,22 159:11 164:16,22 185:15</p> <p>need [5] 5:10 65:8,10 177:17 178:19</p> <p>needed [1] 181:21</p> <p>neuro [2] 36:13,20</p> <p>never [19] 31:23 102:21 103:21 111:9,9,11,21 115:20 126:9 143:24,25 145:15 153:18,20,24,25 167:16 178:13 190:10</p> <p>new [26] 1:16,17 4:4,13 8:8,15,18 10:15,19 69:3 80:3,5,10 133:18,21 134:4 159:8 167:10,13,13,20 177:2,3 188:19 194:3,7</p> <p>next [10] 26:15 32:11 51:6 112:22 115:23 135:18 141:17 157:22 172:2 173:6</p> <p>nice [1] 4:16</p> <p>nine [4] 141:16 143:5,9 163:23</p> <p>nobody [4] 23:22 27:24 124:13 177:10</p> <p>nods [1] 11:7</p> <p>none [1] 143:3</p> <p>norm [1] 100:21</p> <p>northern [1] 179:9</p> <p>notary [5] 1:17 3:19 4:4 191:15 194:6</p> <p>noted [1] 191:9</p> <p>notes [9] 96:16,17 97:9,11 115:4,14,18,20 182:16</p> <p>nothing [2] 25:20 66:25</p> <p>notice [1] 62:23</p> <p>noticed [1] 68:10</p> <p>notification [1] 78:24</p> <p>notify [1] 135:12</p> <p>november [1] 133:13</p> <p>number [16] 34:14 35:15 50:2 70:14 73:3 85:7 96:12 172:16 176:7,23 177:12,24 179:4 180:13 183:5 187:4</p> <p>numbers [2] 21:22 177:9</p> <p>O</p> <p>objections [1] 3:13</p> <p>obligation [1] 161:16</p> <p>obtaining [4] 161:22 162:19,20 181:16</p> <p>obviously [1] 188:3</p> <p>october [10] 151:2 172:19,20 173:8,10 174:5,17,23 175:23 194:18</p>
--	--	--	--

<p>office [31] 24:11 25:7 30:3 42:25 97:25 98:3,8,15 107:2 116:24 119:20 120:2,24 124:8,8 133:23 135:16 136:22 137:14,18,21 141:24 156:10,11 159:8 166:25 167:9,13,20 173:11 182:18</p> <p>offices [1] 1:15</p> <p>official [10] 22:14 23:12 24:20,25 65:13 77:6,8 117:11,14 138:9</p> <p>officially [4] 15:7 152:23,25 161:15</p> <p>officials [1] 182:14</p> <p>often [3] 72:25 75:2 187:21</p> <p>okay [9] 11:10 19:9 160:10,13 165:5 168:19 172:10,22 181:4</p> <p>old [1] 53:21</p> <p>once [4] 75:5 76:3 106:4 152:8</p> <p>one [90] 11:5 15:4 17:4,6,7,11 28:5 33:12 40:14,16 41:3 43:6,8 44:3,11,15 45:3,11 49:16 52:7,7,11 54:18 55:3,4,7,11 56:9,10,14 57:3 58:2,14 59:12 60:4,9,11,25 61:10 62:8 63:18 64:7 70:6,7,11,12,12,20,25 71:3 73:13,16,23,24 74:3,6 76:8 77:17 83:15 87:3 93:3 95:7,24 97:14 105:8 110:12 130:11,17 131:12 132:11 134:13,14 146:6 151:7 154:23 155:3,6 157:7,10,16 161:6 164:24 167:25 168:6 176:19 183:18 184:6 185:12 187:11 188:6</p> <p>ones [2] 49:5 187:22</p> <p>only [21] 5:12 12:23,24 22:12 34:20 49:6 55:17 63:9 64:25 70:21,25 71:21 72:9 81:5 91:12 95:7 103:22,23 130:9 160:2 168:19</p> <p>operate [1] 123:10</p> <p>opinion [1] 162:3</p> <p>opportunity [2] 122:2,6</p> <p>opposition [2] 150:8,13</p> <p>oral [3] 40:22 42:20,22</p> <p>order [10] 1:14 63:3 128:14,18 139:24 151:22 152:20 157:20 159:23 166:20</p> <p>orders [1] 173:13</p> <p>ostracized [2] 180:16 181:9</p> <p>other [81] 11:5 12:12,22 22:5 23:15 27:23,25 33:5,8,16 34:12,16 35:17,19 22 41:10,11 45:10,22 47:22 49:3,4 51:13,20,21,25 54:3 55:19,21 56:13 59:16 61:16 62:11 63:13,15,21 64:6 69:22 70:4,23 78:23 81:3,21,24 83:11,13 86:19,20,22,24 87:18 104:14 105:14 110:2 113:18 120:25 146:14 150:2 153:13 156:17 162:16,23 164:3,3 170:12 171:15,16 172:22 174:21 176:14 177:7 181:6,8 182:23 185:20 186:16,16 188:2,6 189:2 190:7</p> <p>others [1] 111:23</p> <p>otherwise [5] 11:6 52:23 56:4 82:16 149:7</p> <p>out [23] 13:4 21:18 32:13 37:4 47:13,15 56:7,11 59:3 62:21 71:11 78:20 91:13,14,23 101:4 102:12 104:5,16 133:7 137:7 162:13 185:6</p> <p>outcome [1] 194:16</p>	<p>over [6] 4:17 28:8 31:5 134:22 142:19 186:10</p> <p>overtime [1] 188:14</p> <p>owed [2] 188:12,14</p> <p>own [2] 120:6,16</p> <p style="text-align: center;">P</p> <p>p.m [1] 191:9</p> <p>package [3] 131:18 132:2,3</p> <p>page [35] 22:11 113:25 129:25 130:8,10 136:5 141:7,15 143:5,8 150:25 151:7 157:4,21,23 159:21 160:17 163:16,19,23 164:6 165:14 166:4,6,12 167:6,18 168:13,22,24 170:7,10 190:20 192:3 193:7</p> <p>pages [3] 130:11,17 131:4</p> <p>paid [5] 161:17,19 162:6 177:20 188:13</p> <p>paper [1] 94:25</p> <p>papers [1] 74:8</p> <p>paragraph [9] 115:3 136:23 138:10,25 141:9,14 146:17 151:7 157:4</p> <p>part [17] 16:11 49:17 72:20,21 75:20 81:13 101:15,16 131:18,22 132:2 154:13 164:24,24 169:12 172:17,18</p> <p>particular [4] 19:15 40:14 45:11 187:14</p> <p>parties [2] 3:7 194:14</p> <p>parts [6] 41:10,11 60:23 81:21 82:2,4</p> <p>pass [14] 34:2 35:2 36:20 82:8,15 92:16 107:7,10,22,23,23 128:8 158:25 182:3</p> <p>pass/fail [1] 105:2</p> <p>passed [18] 35:4 74:10 101:16 104:22 106:16,21,24 128:17,22 141:11 154:7,19 164:8,11,16,22 182:2 185:14</p> <p>passing [9] 101:15 104:17 114:21,23 128:11 157:9,16,18,20</p> <p>password [1] 78:8</p> <p>past [2] 119:21 178:12</p> <p>pathology [20] 52:7,9,11 54:18 55:10 56:7,9,10,14 57:3 58:2,13 59:11 60:4,11 61:10 63:18 64:7 66:8 71:3</p> <p>patient [1] 17:11</p> <p>patients [1] 82:17</p> <p>pay [8] 8:15 111:19 126:22 154:4,22 161:19 167:15 168:4</p> <p>paying [1] 177:23</p> <p>payments [1] 123:14</p> <p>pbl [1] 44:20</p> <p>pe [2] 110:16,16</p> <p>penalize [1] 53:11</p> <p>penalized [1] 53:9</p> <p>penalties [1] 52:25</p> <p>pending [1] 5:13</p> <p>penmanship [6] 94:5,9,11,18 102:4,6</p> <p>people [13] 11:8 27:24,25 33:16,18 47:2 55:24 87:18 94:12 97:7,15 106:15 107:6</p> <p>percent [23] 40:17 41:4 43:6,9,22 44:3,11,16 45:3,7 49:16 55:4,7 58:</p>	<p>12 59:11 60:4,9,25 92:18 93:23 107:15,18,25</p> <p>percentage [5] 31:16 40:2,10 41:2 45:3</p> <p>percentage-wise [1] 73:11</p> <p>perez' [2] 124:8 185:25</p> <p>performance [2] 114:19,21</p> <p>period [2] 125:25 143:19</p> <p>permission [2] 158:19,23</p> <p>perri [17] 83:23,25 84:18,22,23 85:20 112:15 113:7,14,21 116:4 121:18 122:25 124:5 125:16 138:16 186:7</p> <p>perri's [1] 169:25</p> <p>person [10] 25:25 28:7,9 29:16 42:24,25 46:22 47:20 80:18 93:12</p> <p>personal [1] 45:16</p> <p>personally [3] 109:7 123:13 184:16</p> <p>pete [1] 70:12</p> <p>pharmacist [5] 5:25 7:23 8:11 112:5 190:16</p> <p>pharmacology [4] 9:9 10:10 52:7 66:7</p> <p>pharmacy [6] 7:3,11,12 8:24 191:5,5</p> <p>phase [2] 167:7 168:5</p> <p>phone [26] 28:8 42:24 80:14,18,19 81:4 83:15 84:5,6 85:10,11,14,15,18,21 94:16,19 99:11 100:17,23 112:11 114:3,6 149:7 182:16 186:3</p> <p>phony [6] 90:11 91:17,19 114:12,14,17</p> <p>physical [3] 105:22 107:21 110:17</p> <p>physiology [2] 36:14,21</p> <p>place [1] 169:22</p> <p>placed [1] 104:3</p> <p>places [1] 120:25</p> <p>plaintiff [2] 1:13 88:7</p> <p>plastic [5] 71:23 72:18,24 75:16,18</p> <p>please [13] 4:8 5:9,11 20:2 81:9 87:20 90:24 129:10 144:11 150:6 182:15,24 183:2</p> <p>plus [9] 18:10,14,17,21 19:21 21:11 23:21 25:23 28:12</p> <p>point [23] 12:4 15:18 16:3 17:22 24:23 39:23,25 47:13 64:14 67:3,6 68:8 90:8 97:24 111:5 125:3,15 132:15 142:2 151:20 153:13 164:21 169:20</p> <p>pointed [1] 170:7</p> <p>points [16] 39:17,20,24 43:5 74:24 96:14,21,22 97:2,8,17,20,21,22 103:14 104:15</p> <p>policies [3] 120:17,20 121:2</p> <p>policy [5] 22:2 120:22,23 146:18 147:13</p> <p>poor [3] 94:5,9,11</p> <p>portion [19] 16:9,20 22:5 31:25 41:18 43:6 44:4,11,16 71:22 72:15 74:20 91:6 93:20 101:4,20,21 102:8,13</p> <p>position [2] 5:23 6:3</p> <p>possible [4] 101:4 102:12 120:10,21</p> <p>post [2] 55:23 120:17</p>	<p>posted [17] 55:18,25 79:10 88:9,23 102:15 119:13,16,18 120:10,14,20,23 122:15,19,19 138:23</p> <p>poster [1] 13:3</p> <p>posting [1] 114:11</p> <p>postings [3] 120:4,7,11</p> <p>practical [3] 71:22 72:21,24</p> <p>practicing [1] 162:15</p> <p>practitioner [1] 179:11</p> <p>pre-register [4] 111:14,15,17,18</p> <p>pre-registered [3] 111:10,11 153:25</p> <p>pre-registration [3] 127:18 154:3,4</p> <p>precedes [1] 158:12</p> <p>prepared [1] 29:10</p> <p>prerequisite [8] 157:10,12,15,18,19 158:9,10,16</p> <p>presented [1] 97:13</p> <p>presumably [2] 51:18 65:18</p> <p>presume [4] 16:23 17:22 64:12 123:3</p> <p>presumed [1] 11:15</p> <p>pretty [2] 38:2 174:4</p> <p>prevent [1] 139:18</p> <p>prevented [1] 157:7</p> <p>previously [1] 115:3</p> <p>print [1] 79:20</p> <p>printout [1] 79:20</p> <p>prior [17] 44:10 49:10 50:10 65:6,9,12 66:23 77:19 78:12 91:23 100:4 136:16 146:10,13 172:24 188:17,19</p> <p>privacy [1] 169:2</p> <p>privy [1] 169:15</p> <p>probably [5] 5:4 24:18 27:11 32:15 161:4</p> <p>probation [1] 10:25</p> <p>problem [1] 41:4</p> <p>problem [15] 18:11 29:20 40:19 41:18 42:18 44:21 46:25 49:17 50:14 60:23 86:11,21 94:13 117:20 163:2</p> <p>problems [4] 179:19,20,23,25</p> <p>procedure [3] 31:9 32:18 163:20</p> <p>procedures [2] 29:22 126:12</p> <p>proceed [2] 117:20 162:4</p> <p>proceeded [1] 29:5</p> <p>proceeding [1] 181:11</p> <p>process [3] 141:23 162:25 166:19</p> <p>produce [3] 182:15,19,24</p> <p>produced [8] 130:10,14,21 175:21 177:8 182:8,11,14</p> <p>production [2] 130:11 182:12</p> <p>profession [1] 178:21</p> <p>professor [14] 26:17,22 27:20 34:4,5,6 40:25 42:17 60:10,14,20 70:6,10 183:11</p> <p>professors [4] 70:8,14 181:5 184:7</p> <p>program [4] 15:25 69:18,19 123:6</p> <p>progress [2] 103:24 122:16</p> <p>progressed [1] 7:22</p> <p>proof [4] 81:24,25 82:3 114:22</p> <p>properly [3] 37:4,9,13</p> <p>provide [5] 105:20 124:15 148:12 175:11 177:13</p>
---	---	---	--

provided [7] 24:18 77:20 124:19
134:5 161:12 175:5,15
provision [5] 163:10 164:18 165:
15 167:23 170:7
provisions [2] 161:24 168:20
psychological [1] 181:13
psychologically [1] 163:25
public [5] 1:17 3:19 4:4 191:15 194:
6
purportedly [1] 171:17
purposes [2] 53:2 170:2
pursuant [1] 1:14
put [5] 10:24 23:5 38:5 105:10 175:
9

Q

queens [5] 4:12 125:4 136:2,14
150:15
question [12] 3:14 5:3,9,13 16:7 93:
11 127:7,11 141:5 154:16 160:7
172:15
questioning [2] 90:14 91:20
questions [5] 5:6 97:13,16 160:8
189:12 191:8
quiet [4] 53:9,20 62:14 68:18
quotation [1] 169:3
quote [1] 165:11

R

rather [1] 172:23
re-application [2] 166:20,24
re-register [1] 126:9
re-registering [1] 126:7
reach [1] 85:13
read [5] 48:13 57:19 127:11 150:17,
21,23
reader [1] 95:14
reading [1] 166:3
real [1] 158:20
really [1] 96:7
reapply [5] 138:17,18,19 142:2,5
reardon [1] 185:11
reason [5] 10:18,25 63:9,15 94:10
reasonable [1] 94:6
reasons [2] 63:13 167:25
recall [13] 8:2 12:15,16,21 13:10,
11,13 14:5,8 15:2,6,23 16:6,17 17:2,
14 18:6 20:24 25:3 27:18 30:11,13,
20,23 31:12,19 32:16 33:22,24 35:
21,25 36:16 38:20 39:22 40:11,12,
14 41:7,11 45:8,10,11,22 46:3,23
48:14 49:2,4 52:4 54:8 55:25 56:5
57:8,9 58:9 59:13 64:9,17,25 67:15
68:15,15,21 69:12 70:15 71:10 72:
4,6,14,16 73:3,5,8,12,21 74:6 76:11
77:25 78:5 79:15 80:20 83:2,13 87:
7 92:8 93:7 94:8 95:12 96:3 101:7,
10,24 102:2,7,10,22 103:12,15,16
105:22 108:8 113:13,20 114:5 115:
13 116:12 120:19 125:11,18 126:2,
5 128:5 131:8 136:9,19 137:6,8
147:19 148:22 149:19 150:4 151:4
155:18 156:17,23 157:3 171:13,14
184:24 187:2 188:23
recalls [1] 139:10
receive [3] 7:7 9:4,24 19:20 20:20,

23 22:13 24:21 25:4 37:18 55:10,
13,18 64:21 74:10 76:14 78:24 96:
2 98:20 104:15 115:17,19 117:23
124:18 125:21 127:17 128:10 135:
14 136:21 158:4 174:21
received [53] 13:8 14:12 17:23 19:
8 21:23 22:4,15 37:21,25 38:22 39:
3 41:3 44:3,10,15 56:13 58:5,7,10,
22 59:22 61:3,12 64:14 65:13 67:3
68:8 71:13 74:13 76:25 98:19 101:
8 102:12 103:21,23 104:2 105:13,
14 115:20 117:11,25 118:17 121:4
125:22,23 129:6 145:9 147:17 154:
17 158:6 185:13,17 190:6
receives [1] 169:7
receiving [10] 53:15 65:2,6,9 66:23
101:10 113:13 122:9 161:17 181:
19
recently [1] 179:9
recess [2] 76:21 144:5
recollection [3] 12:2 64:19 114:7
recommendation [1] 132:12
record [19] 4:9,25 19:4 23:6 38:6
76:20,24 100:2 105:11 129:21 130:
14,19 144:9 169:12,19 177:16 189:
8,10 194:11
records [7] 49:6 105:11,19 159:7
165:4 169:5 178:2
recovery [1] 176:11
redid [1] 107:3
reduce [1] 53:13
refer [2] 21:6 177:12
reference [1] 22:12
referred [5] 17:5 26:25 112:15 127:
10 141:4
referring [20] 48:24 91:4,15 95:21,
22 103:6,8,17 120:8,12 122:17 141:
14,15 143:6,13 151:21 154:13 166:
12 170:20 186:9
refers [3] 38:12 52:19 114:3
reflect [2] 98:23 114:18
reflected [5] 23:16 41:19,22 43:9
106:19 118:20
reflecting [3] 18:20 19:21 149:10
refused [2] 43:5 55:6
regard [1] 155:21
regarding [5] 52:20 86:8 88:8 121:
19 183:9
regardless [1] 86:18
register [5] 126:10,11,18,21 153:12
167:20
registered [5] 111:20 136:25 141:
17 151:15,24,24,25 167:8
registrar [2] 116:24 181:24
registrar's [13] 97:25 98:3,8,15
119:19 120:2,14,24 135:16 136:22
137:13,18,21
registration [5] 111:20,21 126:12
167:12,14
regret [1] 145:3
regular [3] 52:2 66:19 161:18
regularly [1] 20:20
regulation [3] 120:8 140:7 152:19
regulations [5] 120:6 132:18 140:
21 141:3 160:25 163:17

rejected [2] 133:8,9
relate [1] 188:11
related [5] 21:19 73:18 179:21,25
194:13
relates [1] 180:11
release [12] 124:15,19 142:9 149:
21,23 161:22 165:9,20 172:18,23
173:5 181:17
released [3] 117:15 165:8 173:6
releasing [1] 146:5
relied [1] 182:20
relocation [1] 177:6
rely [2] 182:6,9
remain [2] 141:16 151:23
remainder [2] 130:19 141:19
remained [1] 53:24
remaining [1] 5:6
remediate [1] 92:11
remediated [1] 92:3
remember [31] 12:9 26:4,5,19,20
27:10 34:7,9 37:20 40:3,5 56:22 59:
14 60:13 64:4 66:25 71:15 87:14
92:3 93:16 95:6 101:21 103:9,13
105:7 112:3 163:10 171:19 175:18
184:20,22
reminder [1] 86:10
removed [1] 19:18
rendin [1] 185:2
rendon [1] 144:19
repeat [13] 5:9 32:12,14,16,19,25
64:5 108:6,9,11,15 127:6,8
replied [1] 86:14
report [5] 23:17 52:25 120:18 146:5
156:21
reported [1] 70:9
reporter [21] 4:25 13:19 20:7 48:4
57:16 87:24 99:19 113:2 116:3 118:
8 121:15 124:2 127:12 129:15 135:
22 140:17 144:15 145:21 150:11
159:18 172:7
reporting [2] 69:16 156:23
represent [1] 4:19
representing [1] 177:21
request [31] 14:22,25 15:5 19:4 23:
6 38:6,18 65:5,8,10,11,12 89:9,10,
12 105:11 115:6,11 117:3 123:14
141:12,21 148:24 149:15 166:13,21
169:6,7 175:20 177:15 182:12
requested [5] 19:3 115:3 123:5
124:16 177:10
requesting [1] 122:9
requests [2] 122:11 149:17
require [1] 166:15
required [9] 16:12,16 61:6 108:11,
15,20 128:14 147:14 166:20
requirement [2] 145:12 151:16
requirements [3] 61:9 119:12 182:
5
requires [2] 119:24 146:18
reserved [1] 3:14
reside [1] 4:11
resolving [1] 169:25
respect [1] 163:18
respected [1] 163:19
respective [1] 3:7

respond [5] 82:20,20 84:14 138:12
156:20
responded [1] 82:21
responding [3] 123:2,2 148:20
response [9] 26:13 28:13 49:20 61:
4 80:15,17 118:17 156:19 182:10
responses [2] 172:15 182:21
rest [2] 109:9,10
restarted [1] 178:11
results [1] 51:8
retake [19] 33:25 62:3 106:15,22
107:3,7 108:20 109:17 110:5 111:6
126:15 140:8 141:13,22 142:5 165:
18,23 166:14 181:21
retaking [1] 107:5
retook [2] 92:14 107:9
return [18] 68:22 122:2,6,11,23 123:
5,7,14 153:13,16,21,22,24,25 154:2,
24 168:15,17
returned [4] 19:10 69:13 153:18,20
reviere [5] 42:15,16,23 44:5 45:12
review [3] 31:21 57:23 169:4
reviewed [4] 14:4 88:10 124:7 140:
22
reviewing [1] 14:2
revised [1] 93:19
reyes [2] 169:10,15
rid [1] 53:22
rights [1] 169:2
rock [1] 45:18
ronnie [1] 183:6
rosemarie [1] 185:11
ross [85] 4:19 8:7 10:21 11:15,19,
22 12:5,13,18,23,24,25 13:24 14:12,
14 15:11,15 20:10,18 21:25 24:21
27:16 29:6 32:19 35:23 46:19 47:7,
10 50:7 51:15 69:10 77:20 83:19
84:18 111:16 113:19 116:24 118:
15 119:25 120:5,16,19 122:8,22
125:25 135:25 139:24 140:19 142:
15,19,22 144:19 145:5,14 150:14
151:17 153:2 154:3 157:8 160:19,
23,25 161:2,9 165:15,19 166:6 167:
22,24 168:21 169:8 170:23 171:17
178:5,10,13 180:17,23 181:24 182:
13,21 185:12 188:18 190:7 191:3
rotate [1] 46:21
rotation [3] 122:3,7,12
rule [1] 11:5
rules [3] 4:24 140:20 163:17
runs [2] 17:20 64:3
rusm [2] 151:23 152:10

S

salary [1] 178:12
same [14] 3:9,19 5:2 23:16 34:5,6
46:22 58:17 70:24 86:9 87:18 113:
25 159:21 175:15
sat [5] 135:5 142:10 143:22 145:9
147:8
satisfactory [1] 110:13
saturday [1] 90:6
saw [13] 13:2 39:4 48:17 58:21 79:
10,16,16,18,22 93:23 98:17 100:7
102:24

<p>saying [16] 11:7 42:4 47:12 85:22 87:18 102:22 120:13 131:9 152:13 153:5 167:22 169:22 172:23,24,25 174:14</p> <p>says [44] 21:11 22:10 58:11,19 83:4 86:18 88:13,22 90:24 91:12 92:18 94:21 95:8,14 97:12 100:10 107:2 113:10 115:3 123:4 136:24,24 137:9 138:10,25 140:7 141:9,16,20 143:10 145:2 146:17 147:20 151:8 152:8,15 157:5 163:16 166:12 167:7 169:25 170:10 176:2 177:6</p> <p>scan [3] 72:9,10,11</p> <p>scheduled [3] 143:12 158:21 163:24</p> <p>school [44] 8:23 10:22 14:19,23 15:15,25 20:18 30:5 46:5 50:8 56:23 60:18 62:10 106:24 121:25 123:12 124:20,23 125:8,15 132:18 134:19 137:2 138:11,14 139:4,6 140:19 142:8 145:5 146:19,20 148:14 152:5,20,24 153:4,7 160:23 161:15 162:14 166:7 178:17 189:24</p> <p>school's [3] 70:17,19 106:18</p> <p>schooling [1] 176:21</p> <p>schools [4] 10:23 11:12 12:23 190:7</p> <p>science [20] 10:7,9 16:2,5,8,20 36:6,13,21 52:13 63:25 66:2 67:17 69:23 143:10 157:17 164:9,12,16 168:5</p> <p>sciences [1] 167:9</p> <p>score [43] 30:24 40:15,16,18,19 41:2,17 44:7 45:13 61:16 62:7 63:11 83:19 101:3,12 103:21 106:9,11 107:11,13,16 128:11 129:6 142:9 146:5 149:21,24 157:24 161:23 162:13,20 165:13,20 167:3,4,5,6 172:18,23 173:5 176:3 181:18,19</p> <p>scored [9] 20:17 43:22 49:17 55:3,7 60:4,9 105:3 107:12</p> <p>scores [25] 21:17 22:7 30:25 31:6,21 40:13 41:8,13,15,17 60:14,17 103:13,16,19 104:7,10,20,25 105:4,9,12,14,19 118:20</p> <p>scoring [1] 59:11</p> <p>sealing [1] 3:8</p> <p>second [18] 24:15 25:13 38:16 48:8 63:23 94:21 95:8 107:16 131:21 132:25 133:3,6 134:14 136:5 141:12 146:17 157:18 160:15</p> <p>secretary [2] 85:17 185:25</p> <p>see [25] 19:21 53:15 57:5 58:10 79:9 88:11 89:19 90:12,18,25 104:5 115:10,16 117:10,19,21 119:10 120:4 124:11 144:23 145:6 146:23 148:19 179:17,22</p> <p>seeing [5] 14:5,8 44:15 48:14 55:25</p> <p>seeking [2] 176:11 180:7</p> <p>seemed [1] 31:11</p> <p>seems [5] 29:20 100:18 114:11 162:7 169:13</p> <p>seen [9] 20:12 88:18 100:3 140:25 144:20 165:13 169:8 179:2,4</p>	<p>seena [4] 131:24 165:9 172:25 174:13</p> <p>seena's [1] 165:12</p> <p>segment [4] 16:9 36:6 42:18 143:10</p> <p>segments [1] 16:20</p> <p>semester [64] 16:16,25 17:17,19 18:4,8 19:23 20:17 21:4 24:15 33:9 34:10,13,14 35:7,14 36:3,15 38:12 51:18,24,25 52:3,16 63:17,22,23,25 64:3,4,8,10,18,22,22 65:21,23,23,25 66:4,22 67:4,19 68:23,24,25 70:20 75:24 100:13 103:19,22 108:16 109:13 122:4,7,13,24 126:15,25 127:13,16 128:5 163:2 168:16</p> <p>semesters [4] 16:19 35:11,20,24</p> <p>sena [1] 131:17</p> <p>send [5] 89:12 111:17 125:19 126:22 154:5</p> <p>senior [2] 7:23 8:11</p> <p>sense [1] 100:14</p> <p>sent [16] 13:4 24:23 47:21 86:9 123:17 126:24 127:3 133:19,22 142:8 155:4 172:25 174:13 175:17 181:24 185:6</p> <p>sentence [1] 141:20</p> <p>sentences [1] 121:24</p> <p>separate [3] 75:15,23 93:2</p> <p>september [9] 1:9 24:14 33:3 64:24 65:19 111:25</p> <p>series [1] 5:5</p> <p>serve [1] 53:2</p> <p>session [1] 144:7</p> <p>sessions [1] 110:23</p> <p>set [4] 4:24 176:8 194:10,17</p> <p>settled [1] 188:13</p> <p>settlement [2] 169:14,23</p> <p>seven [5] 129:25,25 130:8,8,10</p> <p>seventeen [3] 141:18 163:24 164:4</p> <p>seventeen-week [2] 143:12,18</p> <p>several [7] 70:8 73:2 118:14 119:6,8,14 170:12</p> <p>shall [2] 3:9,14</p> <p>she's [1] 87:9</p> <p>sheets [2] 29:11 30:2</p> <p>short [2] 35:12 76:21</p> <p>shortly [4] 65:17 128:12,21 144:25</p> <p>show [11] 66:5 91:19 112:19 121:16 135:23 139:2 150:12 167:24 168:3,6,9</p> <p>showed [4] 25:12,13 44:8 171:22</p> <p>showing [5] 44:10 45:12 88:4 99:24 116:14</p> <p>shown [1] 23:12</p> <p>shows [2] 88:22 163:20</p> <p>sign [2] 77:16 91:19</p> <p>signature [6] 116:20 131:9 136:6,7,8 151:2</p> <p>signed [7] 3:19,20 131:15,16,22,23 151:5</p> <p>signing [2] 136:9 151:4</p> <p>similar [1] 70:4</p> <p>simply [1] 167:15</p> <p>since [6] 6:8 66:5 119:7 149:8 165:</p>	<p>13 175:23 177:23 191:3</p> <p>sit [5] 96:21 128:15,18 132:14 142:25</p> <p>site [20] 77:19,23 78:5,20 79:7,9,18,19 88:25 89:14 90:19 91:17,24 98:17 102:16 104:3 114:13 122:19 138:8,24</p> <p>sites [1] 77:17</p> <p>sitting [4] 100:4 136:17 139:19 146:14</p> <p>six [4] 130:12,17 138:10 163:20</p> <p>sixth [6] 68:23,23 122:3,7,12,24</p> <p>sixty [3] 21:15 22:5 58:12</p> <p>skp [1] 6:10</p> <p>small [2] 40:24 110:23</p> <p>soap [9] 96:15,17,20,20 97:12 103:5 115:4,14,20</p> <p>society [2] 17:12 34:19</p> <p>solely [2] 32:6 176:13</p> <p>somebody [4] 32:15 85:15 107:2 148:20</p> <p>somehow [1] 79:19</p> <p>someone [4] 56:15,16 109:19 145:25</p> <p>sometime [7] 8:3,4 9:22 13:12 64:23 68:4 171:6</p> <p>sometimes [5] 30:10 93:8 94:24 95:23 102:5</p> <p>somewhere [2] 15:21 38:3</p> <p>soon [3] 84:3 120:10,20</p> <p>sorry [14] 17:23 24:10 29:4 38:9 51:21 56:10,19 63:24 68:7 80:6 109:5 114:2 127:15 155:6</p> <p>sort [3] 22:7 39:25 62:9</p> <p>sought [1] 176:8</p> <p>sounds [1] 21:24</p> <p>speaking [4] 4:25 29:19 84:3 123:20</p> <p>special [2] 158:19,23</p> <p>specialist [2] 179:12,13</p> <p>specific [3] 92:8 154:13 155:23</p> <p>specifically [13] 13:11 27:12 30:14 73:8 144:19 145:25 151:14 163:11 166:8 168:14 175:16 186:9,24</p> <p>spell [1] 24:5</p> <p>spelled [1] 24:6</p> <p>spend [1] 7:4</p> <p>spent [2] 112:4 176:24</p> <p>spoke [16] 25:25 27:16,19 32:15 37:14 47:20 50:3 81:5 84:18 86:19 100:16 123:16 124:22 125:15 171:16 183:14</p> <p>spoken [2] 184:15 187:9</p> <p>sponsor [3] 165:15,25 166:16</p> <p>sponsored [9] 139:23 140:4 141:12,22 142:11,13,15 166:13,17</p> <p>sponsors [1] 165:22</p> <p>sponsorship [6] 137:3,5 138:2 142:20,23 144:2</p> <p>spring [5] 11:25 12:3 13:12 128:2,3</p> <p>st [3] 6:24 7:5 10:13</p> <p>staff [4] 180:25 181:2,3 185:12</p> <p>stand [2] 104:16 189:5</p> <p>standards [1] 100:20</p> <p>stands [1] 97:6</p>	<p>start [10] 14:23 15:5,7 16:24 35:14 36:2 126:8 131:8 161:5 168:6</p> <p>started [6] 6:5 17:16 29:19 51:17 65:18 71:7</p> <p>starting [6] 14:15,19 17:17 36:15 89:9 110:2,5 111:24</p> <p>starts [2] 82:8,11</p> <p>state [9] 1:17 4:4,8 49:24 130:13 142:22 172:18 194:3,7</p> <p>stated [7] 27:12 109:22 132:17 157:20 165:17 167:24 180:6</p> <p>statement [11] 93:15 95:18 108:25 128:13 129:20 151:12 157:11 167:19 169:16 172:25 174:14</p> <p>states [13] 1:2 6:13,17 67:20 121:24 151:14 152:19 164:6 166:8,8 168:14,23,24</p> <p>stating [4] 22:16 165:10 174:9 185:13</p> <p>status [1] 126:4</p> <p>stay [5] 53:9,20 62:14 68:18 97:8</p> <p>staying [1] 96:15</p> <p>step [29] 82:9,16 129:2,3,4,7 131:5 132:4 134:24 136:25 137:24 139:19,24 142:6 146:6 147:7 148:13 157:7,10,13,25 159:2,11 161:3 164:7,11 165:5,7 185:15</p> <p>still [10] 7:17 36:5 80:3 86:10 112:13 113:10 136:21 160:3 170:15 176:3</p> <p>stimulating [1] 85:21</p> <p>stipulated [3] 3:5,12,17</p> <p>stonybrook [2] 5:21 190:13</p> <p>stopping [1] 122:16</p> <p>strange [1] 98:5</p> <p>street [3] 1:16 2:9 4:12</p> <p>stress [3] 180:3,4 181:13</p> <p>strike [1] 169:12</p> <p>student [26] 6:20 15:20,22 44:25 46:11,12,14,17,24 47:5,10 53:21 95:15 117:4,6,9 141:20 146:19 148:14 151:9,15,16,22 152:8,14 161:14</p> <p>student's [3] 52:21 157:8 169:5</p> <p>students [22] 44:22,24 45:19 86:19,20,22 140:20 141:10,16 143:3 164:4,7,10 165:15,17 166:7,13 167:7,19 168:14 180:24 184:4</p> <p>students' [1] 120:9</p> <p>studied [2] 6:21 161:20</p> <p>studies [2] 47:7 170:13</p> <p>study [1] 6:23</p> <p>studying [1] 6:25</p> <p>stuff [1] 82:17</p> <p>subjective [1] 95:13</p> <p>submit [2] 12:5 119:25</p> <p>submitted [1] 132:11</p> <p>submitting [1] 13:6</p> <p>subsequent [1] 124:7</p> <p>substively [2] 186:5 187:5</p> <p>subway [1] 177:5</p> <p>succeed [1] 50:3</p> <p>successfully [1] 164:13</p> <p>sudden [1] 63:4</p> <p>suffered [1] 162:12</p>
---	--	---	---

<p>suffering ^[1] 179:24 suggest ^[1] 160:19 summer ^[11] 51:21,22 52:5 54:12 64:11 109:2,4,6,8,20 supplied ^[1] 19:6 supplies ^[1] 177:2 supply ^[1] 178:3 support ^[1] 136:4 supporting ^[2] 177:9 178:20 supports ^[1] 177:17 supposed ^[5] 33:19 39:19 55:5 168:9 173:5 supreme ^[8] 100:9 102:25 125:5, 17 136:2,14 150:15 155:5 suspect ^[2] 13:12 91:10 suspended ^[2] 11:13 190:2 suspicious ^[1] 104:4 sworn ^[3] 3:20 4:3 194:10 system ^[2] 39:24,25</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>table ^[1] 40:24 talked ^[6] 27:21 78:22 89:2 99:12 163:5 187:12 talks ^[2] 51:7 58:13 taught ^[1] 183:19 teaching ^[1] 5:25 telephone ^[2] 100:11 101:6 tells ^[1] 86:20 ten ^[7] 75:7 96:14,22,25 97:8 172: 16,17 test ^[11] 22:7 71:20,21 73:17 106:19, 25 137:10,13,16 138:2 149:8 testified ^[2] 4:5 188:24 testify ^[2] 189:4,21 testimony ^[2] 194:9,12 tests ^[6] 40:2,3,6,22 93:4 104:7 theoretical ^[1] 16:10 theory ^[2] 16:13 36:8 thereafter ^[2] 128:22 144:25 therefore ^[1] 130:10 third ^[2] 36:3 157:19 thirteen ^[2] 164:6 176:7 thirty ^[1] 157:21 thomas ^[1] 184:5 though ^[4] 104:6 142:11 165:16,18 three ^[6] 35:15 56:14 64:3 75:8 110: 9 121:23 151:7 157:4 throughout ^[1] 46:22 title ^[3] 5:24 7:20,22 today ^[6] 14:6 22:21 48:15 100:4,11 142:3 188:3 189:20 tony ^[4] 170:22,24 171:11 187:9 took ^[34] 16:24 17:3,23,23 18:14 19: 16 21:4 30:5 34:18 40:4 61:6 63:18 66:7 74:9 75:23 81:15 86:24 97:11 99:22 101:16 106:10 116:19 127: 23 129:5 134:24 147:9 148:12 149: 8 151:9 153:3 158:13 165:7 169:22 191:4 top ^[1] 160:18 touch ^[1] 187:19 toward ^[1] 45:4 toxicology ^[2] 9:9 10:10 transcript ^[73] 12:11 18:19,24 19:5,</p>	<p>19,21 20:4,16,19,24 21:2 22:14,16, 19,25 23:12 24:17,20,20,24,25 25:5, 12,13 26:14,15 29:11 30:2 37:19,21, 25 38:11 39:3 55:13,17,20 57:4,14, 22 58:4,6,22 64:15 65:3,6,9,13 67:4 68:8 71:13 77:2,9 98:19,20,22 117: 4,9,12,14 118:6,13,16,19 119:20 120:2,18 121:5 122:10,20 125:22 137:22 182:10 194:11 transition ^[1] 148:5 transportation ^[1] 177:4 traumatized ^[2] 163:25 164:2 treated ^[5] 161:21 162:10,17 180: 20 181:6 tremendous ^[1] 153:10 trial ^[2] 1:12 3:15 tried ^[9] 23:22 24:2 27:23 28:2 49: 25 51:5 85:7,11 91:18 tron ^[1] 72:11 trons ^[2] 72:9,10 troy ^[1] 184:12 true ^[2] 157:11 194:11 try ^[5] 23:24 45:17 49:21 80:12 85:9 trying ^[2] 26:19 53:8 tuition ^[5] 112:9 123:14 156:6 161: 20 176:25 turn ^[1] 167:11 turned ^[3] 37:4 165:9,19 twelve-week ^[1] 143:11 twenty-five ^[3] 168:23,24 170:8 twenty-three ^[1] 168:13 twice ^[1] 166:22 two ^[32] 9:8 24:22 30:15,16 34:14, 20 35:13,20,24 47:24 48:2,6,11,13 51:8 52:15 66:7,9,9 69:7 73:25 100: 20 103:4 112:5 119:16 120:3 129: 10,12 132:6,10 134:7 161:2 typically ^[1] 30:6</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>u.s ^[1] 168:25 ultimately ^[1] 181:12 unaware ^[1] 169:21 unconscionable ^[1] 92:19 under ^[4] 28:24 95:13 143:9 189:19 undergraduate ^[2] 7:8 10:12 underneath ^[1] 22:10 understand ^[7] 5:8,14 53:6 57:24 60:6 98:11 160:11 understanding ^[3] 118:25 167:18 181:20 unfair ^[1] 161:23 united ^[4] 1:2 6:13,16 67:20 university ^[59] 4:19 5:7,21 6:24 7: 5 8:7,23 9:5,11,17,19,21 10:13,21 11:16,19 13:24 15:11,15 20:10,18 29:6 33:7 35:23 50:7 69:10 84:19 116:25 119:25 122:8 135:25 139: 25 140:19 142:16,25 145:14 147:4, 6,10,14 150:14 153:2 160:23,25 161:9,16,16 166:7,25 168:23,24 169:6 171:17 180:17 182:13,21 188:18 190:8 191:3 university's ^[1] 141:24 unofficial ^[7] 22:11 23:16 24:17,19,</p>	<p>24 38:10 138:24 unofficially ^[2] 77:11,13 until ^[12] 10:16 98:14,21 103:22 104:10 110:12 148:2 167:2 173:12 175:3,9 181:23 up ^[26] 21:21 23:9 24:25 38:6 55:16 74:8 79:6 88:21 91:20 93:8 95:23 96:13 97:9,12 105:8 124:6 128:7 155:19 167:25 168:3,6,7,9 177:16 182:25 183:3 upcoming ^[3] 122:3,7,24 upgraded ^[1] 90:25 upward ^[1] 52:21 useful ^[1] 50:18 usual ^[2] 82:9,16 usmle ^[70] 128:15,19,25 129:2,4,7, 12,24 130:2 131:5,19 132:4,14,22 133:23 134:24 136:17,25 137:24 138:12 139:19,24 141:11,13,22 142: 5,9,25 143:23 144:2 145:9,13 146:5, 18 147:7,13 148:13 152:6,11 157:7, 13,24 159:2,10 161:3 162:13 164:7, 11,24 165:5,7,10,12,16,18,20,23 166:14 167:5,6 172:21 173:10,16, 21 174:10,22 182:4,5,18 185:15</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vacation ^[6] 109:2,4,6,8,15,20 various ^[1] 33:6 verify ^[1] 133:10 versus ^[2] 135:25 150:14 via ^[1] 77:23 viable ^[1] 160:3 view ^[1] 78:12 village ^[1] 4:13 visit ^[1] 75:12 visitation ^[3] 74:23 75:3,11 visiting ^[1] 70:14 vivian ^[1] 70:13 voice ^[2] 85:16,21</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wages ^[1] 178:4 wait ^[4] 97:24 98:2,7 175:3 waiting ^[7] 112:13 113:10 119:7,8 138:19 162:13 176:2 waived ^[1] 3:10 walk ^[1] 75:13 walking ^[2] 29:5 97:15 wall ^[2] 55:22 56:2 wanted ^[7] 115:15 117:9,19 119:10 133:10 155:22 160:11 wants ^[1] 111:16 warned ^[2] 62:13 68:17 warranted ^[1] 114:21 watch ^[2] 75:12 189:3 way ^[14] 33:13 52:24 55:17,19 56:3 58:13 64:25 98:4,5,9 115:18 161: 21 162:10 194:15 ways ^[1] 162:16 web ^[18] 77:17,19,23 78:4 79:7,8,18, 19 88:25 89:14 90:19 91:17,24 98: 17 104:3 114:13 122:19 138:8 week ^[8] 24:22 35:13 69:5,6,7 163: 24 164:4 168:6 weeks ^[10] 24:22 35:13 110:9 115:4</p>	<p>119:6,9,14,17 120:3 141:18 whatever ^[4] 111:15 173:15 175:20 180:6 whereof ^[1] 194:17 whereupon ^[23] 13:16 20:3 47:25 57:13 76:21 87:21 99:16 112:23 115:24 118:5 121:12 123:23 127: 10 129:11 135:19 140:14 144:5,12 145:18 150:7 159:14 172:3 189:9 whether ^[2] 22:6 90:15 white ^[4] 50:2,5,16 51:3 whole ^[1] 180:23 will ^[43] 5:4 13:14 17:10 23:2,5,6 38: 5 49:21 52:22,25 53:2 57:22 66:5 84:15 85:2,19 86:16 89:8 91:19 93: 9 98:14 100:3 105:20 113:11 120:9, 20 129:9 130:20,25 137:3,5,9,15,23 145:16 149:16,18 160:12 177:13,16 178:2,19 182:25 william ^[2] 145:25 184:14 wish ^[2] 138:10,14 withdraw ^[4] 137:3,5 142:19,23 withdrawal ^[7] 139:15,17 142:22 143:17 148:8 164:2 185:7 withdrawing ^[2] 137:25 168:2 withdrawn ^[19] 11:11 139:3,5,11, 12 140:8 141:10,21 143:22 145:4 152:9,17 153:9 165:11,16,19 168: 15 173:2 174:15 withdrew ^[1] 144:2 withheld ^[1] 55:5 within ^[9] 3:8,18 24:22 119:16 120: 3 168:6 169:5 194:7,11 without ^[1] 163:24 witness ^[6] 4:3 88:5 99:24 189:4 192:3 194:17 witness(es) ^[2] 194:9,12 word ^[1] 42:5 words ^[1] 55:21 work ^[7] 63:7 72:17 126:20 153:21 168:18 178:11 186:11 worked ^[2] 10:15 72:24 working ^[6] 6:19 75:15,18 178:7 190:13,14 works ^[2] 25:2 30:5 worth ^[2] 40:10 74:24 write ^[9] 89:20 95:2,23 97:9 102:5 148:11,15,17 174:6 write-up ^[7] 94:22,23 95:9,11 103:5 110:12 115:4 write-ups ^[7] 95:4 103:4,10,12,14 104:8,14 writing ^[8] 14:25 23:7 38:7 97:18 101:21 102:2 149:17 183:3 written ^[27] 14:31 25 32:3 42:21 72:7 101:23,24 102:8 124:11 wrongfully ^[1] 139:3 wrongly ^[2] 121:25 151:8 wrote ^[4] 97:12 103:12 118:14 174: 8</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>year ^[3] 8:5 9:23 104:6 years ^[7] 4:17 6:4 7:4,6 9:10,20 112: 5</p>
---	--	---	--

york [21] 1:16,17 4:4,13 8:8,15,19 9:
18,20,25 10:15,19 69:3 80:4,5,10
177:2,3 188:19 194:3,7